

EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT
OF PENNSYLVANIA

* * * * *

BENEZET CONSULTING, LLC *

and TRENTON POOL, *

Plaintiffs *

vs. * Case No. 1:16-CV-0074

PEDRO A. CORTES and *

JONATHAN MARKS, *

Defendants *

* * * * *

DEPOSITION OF
MICHAEL ALEXANDER
September 26, 2016

ORIGINAL

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DEPOSITION

OF

MICHAEL ALEXANDER, taken on behalf of the Defendants herein, pursuant to the Rules of Civil Procedure, taken before me, the undersigned, Bernadette M. Black, a Court Reporter and Notary Public in and for the Commonwealth of Pennsylvania, at the Office of Attorney General, 13th Floor, Strawberry Square, Harrisburg, Pennsylvania, on Monday, September 26, 2016, beginning at 10:30 a.m.

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P R O C E E D I N G S

MICHAEL ALEXANDER, HAVING FIRST BEEN DULY SWORN,
TESTIFIED AS FOLLOWS:

EXAMINATION

BY ATTORNEY JOEL:

Q. Good morning, Mr. Alexander.

A. Hello.

Q. We met briefly. My name is Kenneth Joel. I'm here with my colleague, Nicole Radziewicz. We represent the Defendants in this matter. First of all, are you represented here by Mr. Rossi for purposes of today?

A. Correct.

Q. Okay. You haven't been deposed before, I understand?

A. No.

Q. All right. Let me give you a few ground rules. It'll make it go a lot easier. Okay? First, please give verbal answers. Yes, no, whatever explanation you want is fine. Stay away from the shrugs and the nonverbal communication because it will be harder for her to take down and it will be much harder for us to understand what you meant by a shrug in a couple of

1 months from now when we're reading the transcript.

2 Okay?

3 A. Sure.

4 Q. As this gets going, you'll notice that it becomes
5 very conversational. And as such, we have a tendency
6 to speak over each other. I will try my hardest not to
7 do that, and I would ask that you try your hardest not
8 to as well.

9 A. Sure.

10 Q. Again, it just makes it much easier for her to
11 write down, if somebody's taking a full sentence,
12 pause, and then an answer. Okay?

13 A. Question, is she the only recording of this?

14 Q. Yes.

15 A. Okay.

16 Q. Yes. We have a court reporter here. She is
17 taking down everything that everybody says. And what
18 will happen after that is she will prepare a
19 transcript, so in question, answer, question, answer,
20 the whole thing. You will then have the opportunity to
21 review it and read it and sign it and make any
22 corrections. Would you like to do that?

23 A. Receive the transcript?

24 Q. Yeah. And review it and then --- review it ---

25 A. Yes.

1 Q. --- make corrections and sign it?

2 A. Yes.

3 Q. Okay. If at any point ---. This is a smallish
4 room, but if at any point you don't hear me, ask me to
5 repeat. Okay?

6 A. Uh-huh (yes). Yes.

7 Q. There we go.

8 A. I'll be more articulate from this moment forward.

9 Q. Yeah. And the uh-huhs and huh-uhs, while we --- I
10 can tell your inflection, I'm not going to be able to
11 tell it in two months. Fair enough?

12 A. I completely understand that.

13 Q. Okay. If you don't understand a question, tell me
14 you don't understand it. I'm not trying to trick you,
15 I want to get your best information.

16 A. Sure.

17 Q. And if you don't understand, tell me what you
18 don't understand, I will rephrase it in a way so that
19 you understand. Okay?

20 A. Yes.

21 Q. With that said, is it fair, then, to assume that
22 if you do answer a question, you've heard me,
23 understood me and are answering truthfully to the best
24 of your ability?

25 A. That's what I just swore to.

1 Q. If at any point you'd like a break, that's fine.
2 The only thing I ask is that you answer whatever
3 question is on the table and then we'll take a break.

4 A. Sure. If by any chance, could I get a glass of
5 water?

6 Q. Sure.

7 A. Thank you so much.

8 Q. And you've already told me you've never been
9 deposed before. Have you ever testified in any matter
10 before?

11 A. I don't think I have.

12 Q. Okay. Are you, as you're sitting here today, on
13 medication or for any other reason unable to hear me or
14 understand me or answer truthfully?

15 A. No.

16 Q. Please state your full name.

17 A. Michael Andrew Alexander.

18 Q. And what's your address?

19 A. 22 Maryland Street, Apartment 3, Dorchester,
20 Massachusetts, 02125.

21 Q. And just give me a brief educational background,
22 if you would.

23 A. I graduated high school in 2000. I then went on
24 to receive a Grafton Job Corps certificate in plumbing,
25 Home Builder's Institute. I have since been ---. I'm

1 a licensed insurance agent in seven states. But yes,
2 other than that, no extracurricular degrees beyond the
3 Job Corps.

4 Q. Okay. What states are you a licensed insurance
5 agent in?

6 A. Massachusetts --- I'm needing to update my license
7 to, you know ---. Yes, I'm licensed in Massachusetts,
8 South Carolina, New York, Missouri, Mississippi, New
9 Mexico and I believe Texas also, in property and
10 casualty insurance.

11 Q. Is that your primary business, as an insurance
12 agent?

13 A. I was selling insurance for a couple years with an
14 agency called Consumer United, Goji.

15 Q. When did you begin your insurance career?

16 A. The end of 2012 I was hired by Consumers (sic)
17 United and I took my test and obtained my license, I
18 believe it was January 8th of 2013. Yeah.

19 Q. And are you still selling insurance or did that
20 job end?

21 A. That job ended ---

22 Q. Okay.

23 A. --- the beginning of January of 2015.

24 Q. Why did it end?

25 A. I didn't meet my sales quotas.

1 Q. Okay. How long have you lived at the address in
2 Dorchester?

3 A. Well, I have lived there ---. I started living
4 there in November of 2010. I lived there briefly. I
5 then was traveling, doing the petitioning career,
6 helping different states' ballot questions qualify in a
7 multitude of states. So it really depends ---. And,
8 well, during that time, I used my father's address as
9 an official address. His address is 22 Kirk Street,
10 North Falmouth, Massachusetts. Falmouth,
11 F-A-L-M-O-U-T-H, 02556. You know, because --- for
12 purposes I ended up using his address while I was
13 traveling around the country, because I had many
14 different addresses during those periods. Then I was
15 petitioning in all the states.

16 Q. When did you begin your work as a signature
17 collector?

18 A. Well, my first campaign I ever worked was in 2007
19 I believe it was. We were getting questions on the
20 ballot in Massachusetts to eliminate the state income
21 tax, I believe that was 2008. Right. The questions
22 were for 2008, the petitioning was done in 2007. So I
23 believe that was my first petitioning experience.

24 Q. Okay.

25 A. And since then I've worked on all kinds of

1 different campaigns all over the country.

2 Q. So let's talk about that a little bit. Let's
3 start 2016 and we'll work backwards.

4 A. Okay.

5 Q. Okay? Is that okay?

6 A. That's fine.

7 Q. Great. So in 2016, who have you collected for?

8 A. I collected for the ballot questions in
9 Massachusetts this year, questions ---. I'm not sure
10 which numbers they all are. There were three of them.
11 One of them the deal was brokered between the proponent
12 and the state and they withdrew their ballot question.
13 So there's three questions I helped to get on the
14 ballot in Massachusetts. I also helped Rocky De La
15 Fuente get on the ballot.

16 So I helped manage petition campaigns also with
17 contractor Alex Arsenault, myself and my girlfriend,
18 Carol Glovsky, run his office. And there most recently
19 we got Rocky De La Fuente on the ballot in New
20 Hampshire. We helped manage signature drives in
21 Connecticut and Massachusetts. My office was also
22 coordinating Rocky De La Fuente in Rhode Island. We
23 were helping Gary Johnson get on the ballot in
24 Massachusetts. Prior to that we did a candidate in New
25 York State, Phil Pidot, for U.S. Congress. That was in

1 --- I want to say it was May.

2 Prior to that ---. I'm trying to think what we
3 did before that. We did Rocky in Connecticut as a
4 Democrat. We did some Republican candidates in Rhode
5 Island. I know, I was really busy this year. We had
6 Ted Cruz and Donald Trump, I believe in Rhode Island.
7 And then prior to that I believe was my work in
8 Pennsylvania, where we were getting Rocky De La Fuente
9 on the ballot as a Democrat. And I briefly worked for
10 Ted Cruz, I believe it was District 8 --- and correct
11 me if I'm wrong, but that was I believe in Feasterville
12 was the district.

13 Q. Pennsylvania?

14 A. Yes. You guys would know the territory much
15 better than I would. Before then we worked in Vermont
16 for Ted Cruz, Rick Santorum and Rocky. I believe
17 that's all my work in 2016.

18 Q. Okay. No, that's very helpful. Let's drill down
19 a little bit on that. And I don't know if it's helpful
20 for you to go month by month or not. January of 2016,
21 where were you physically doing petition collection
22 work?

23 A. I don't know, I was pretty ---. It was the
24 beginning of the month, I was finishing up the Ted Cruz
25 and Rocky petition in Vermont. And after that I got

1 over --- I took a break and did some skiing.

2 Q. So in January 2016 you did Rocky and Cruz ---

3 A. Yep. In Vermont.

4 Q. --- in Vermont?

5 A. Yeah.

6 Q. Okay. Let me ask you this, how many weeks were
7 you up there doing that work, out of Vermont?

8 A. We were just wrapping up, so probably like at
9 maximum two. I believe the deadline for that was I
10 think the 10th of January.

11 Q. And was that to get Rocky on the Democratic
12 Primary ballot in Vermont?

13 A. Yes.

14 Q. And it was to get Cruz on the Republican Primary
15 ballot in Vermont?

16 A. Correct.

17 Q. And when you say you were up there working, were
18 you actually out in the field collecting signatures?
19 That's what you were doing?

20 A. Yeah, yeah. We were going door to door.

21 Q. And you said we, did you have somebody with you?
22 Did you work alone?

23 A. I worked with an associate of mine, Brian Lyra,
24 and my girlfriend, Carol Glovsky.

25 Q. And when you were up there doing that work, were

1 you --- for that two weeks, anyway, were you in Vermont
2 the whole time or did you go back forth?

3 A. I went back and forth from Vermont to
4 Massachusetts.

5 Q. Okay. What was your travel like?

6 A. I, you know, had my car. Actually, we had a
7 rental car. Most of the time we stayed in Vermont,
8 though.

9 Q. Okay.

10 A. Yeah, we didn't ---. We only went to
11 Massachusetts I think ---. It was during the Christmas
12 break, so, you know, I went back home for the holidays.

13 Q. So with the exception of traveling home for the
14 holidays over Christmas, you were in Vermont for that
15 two-week stretch collecting signatures?

16 A. Oh, we were in Vermont for most of the entire
17 month of December.

18 Q. Oh, okay.

19 A. Yeah, I was --- you said to go back in time. So,
20 you know, again, January, the first couple weeks in
21 January we were just wrapping up the work that we had
22 done in December. We started I think December 7th and
23 ended January 8th, I believe.

24 Q. All right. So just to make sure that I'm
25 understanding this clear, from the beginning of

1 December, December 7th through about January 8th, you
2 were primarily in Vermont collecting signatures day in
3 and day out for Rocky and for Cruz?

4 A. Most of the time was for Cruz. Rocky didn't
5 happen until the end. Rocky --- I was contracted
6 through Benezet for Cruz and I was just helping out my
7 friend Alex for the Rocky signatures, but most of our
8 efforts were for Cruz.

9 Q. Okay.

10 A. Rocky was just like, oh, you're a Democrat? Here,
11 sign this.

12 Q. So other than the Christmas holiday, for that
13 period, beginning of December through the beginning of
14 January, you were in Vermont collecting signatures?

15 A. Yeah.

16 Q. Did you go to different parts of the state or did
17 you ---?

18 A. We were mostly ---. Well, we did some background
19 research, because we were obviously doing a Republican
20 candidate in a very liberal state. So we looked up the
21 makeup of the legislature of Vermont and found that
22 most of the Republicans were concentrated in Rutland.
23 I believe out of eight representatives representing
24 Rutland, seven of them were Republicans. So we thought
25 that we'd have a very good concentration of Republican

1 signers that would sign for Cruz in Rutland. So we
2 worked in Rutland, we worked in an area just west of
3 Rutland. I wish I had a map right in front of me. But
4 yeah, we worked in the Rutland area, Greater Rutland
5 Area.

6 Q. How about in February, where did you go?

7 A. February was about the beginning of February that
8 I was headed to Pennsylvania. I really can't remember
9 exact dates. But, yeah, I want to say it was about the
10 first or second week of February that we came down to
11 --- we first stayed around the like New Hope area. We
12 were concentrated on District 8 for Ted Cruz ballot
13 access.

14 Q. And how long were you in Pennsylvania for that
15 one?

16 A. About a month. Actually, now that I think about
17 it, it was for like the tail end of January that we
18 went and spent about three-and-a-half weeks here in
19 Pennsylvania.

20 Q. When you were in Pennsylvania doing that work, did
21 you move around to other parts of the Commonwealth to
22 collect signatures?

23 A. Yes. We were in --- I believe it was District 8,
24 the Congressional District, and then we were working on
25 Rocky in Philadelphia.

1 Q. And jumping back for a second for your collection
2 in Vermont, were you paid per signature? Is that how
3 you get paid?

4 A. Yes.

5 Q. All right.

6 A. Well, each contract is a little bit different, but
7 for that contract we were paid by the signature.

8 Q. So do you get a contract for every state you go
9 to?

10 A. Not always. Trent likes to deal like that. When
11 I worked for Alex, he just lets me know this is how
12 much the signature is or, you know, I work in his
13 office at an hourly salary.

14 Q. You mentioned Trent and Benezet a couple of times,
15 so let's explore that. Are you employed by Benezet or
16 do you have a contract with them?

17 A. I'm a contractor.

18 Q. Okay. And you can correct me if I'm off base, ---

19 A. Uh-huh (yes).

20 Q. --- but my understanding is that you're in the
21 business of collecting signatures and you will work
22 with Benezet, Benezet will send you to this state or
23 that state to collect those signatures for this
24 candidate or that candidate or this question or that
25 question?

1 A. Yeah. Well, I mean, you know, I'm a contractor at
2 will, per job usually.

3 Q. So when you say contractor at will, you're
4 available to do this collection signature work for
5 candidates directly?

6 A. Benezet or the other contractor will contract with
7 the candidate or proponent who needs to get the
8 signatures, and then they directly hire us as 1099
9 contractors to go out and gather the signatures.

10 Q. Okay. So you do that 1099 work for Benezet?

11 A. Uh-huh (yes).

12 Q. Yes?

13 A. Correct. Yes.

14 Q. And how many other Benezet-like companies do you
15 do it for?

16 A. Currently just two.

17 Q. Two others or two including Benezet?

18 A. Two including Benezet.

19 Q. Okay. Is there anything in either of those
20 contracts with Benezet or this other company that would
21 preclude you from picking up additional work?

22 A. No.

23 Q. For the Pennsylvania work, were you similarly paid
24 per signature?

25 A. Yes.

1 Q. Now do you get paid when the signatures are turned
2 in? What if some signatures are stricken? How does
3 that all work?

4 A. Well, they know me as a good petitioner, that I
5 do, you know, honest work, that I do good validity
6 work. You know, and petitioners who tend to do good
7 work, such as myself, tend to stick around more and
8 become sought after, whereas other petition contractors
9 do shoddy work and their validity is bad and they don't
10 get more jobs. So sometimes the contractors will
11 validate my signatures before turning it in. In those
12 situations, if my validity falls below a certain
13 percentage, they might not authorize my contract or,
14 you know, send me home. But that's never happened once
15 before, so, you know, because I do good work. And I
16 take that very seriously. Could I get some more water?

17 BRIEF INTERRUPTION

18 A. Thank you so much.

19 BY ATTORNEY JOEL:

20 Q. So when you were in Pennsylvania doing the
21 collection work for Cruz and then for De La Fuente,
22 were you in Pennsylvania for that entire period of
23 time?

24 A. Except for the times I was briefly in New Jersey.

25 Q. Okay. So you didn't go back home is a better way

1 of asking?

2 A. Right, right. Yeah.

3 Q. And did you stay at various locations around the
4 Commonwealth?

5 A. Yes.

6 Q. How many different ones?

7 A. Let's see. I submitted my receipts, you know, of
8 the locations I stayed at. It's for the Sheraton in
9 Philadelphia, which was paid for directly by Benezet or
10 Rocky and booked on our behalves. So there was the
11 Sheraton in Philadelphia, there was I believe a Travel
12 Lodge we stayed at. I really don't remember the town.
13 There was a Red Roof Inn that we went and stayed at.
14 And there might have been a place in the middle of New
15 England and Pennsylvania that we may have stayed at, I
16 just don't remember. But those were the main locations
17 that we stayed at.

18 Q. Where did you go after Pennsylvania to collect
19 signatures, if any place?

20 A. I think we went to Rhode Island after that. I
21 pretty much stayed in New England for most of the year.

22 Q. Oh, I'm sorry, getting back to Pennsylvania, you
23 actually collected signatures; correct?

24 A. Yes.

25 Q. And nobody from the Commonwealth stopped you from

1 collecting any signatures?

2 A. Could you rephrase that?

3 Q. Sure, sure. I'll get at it this way. When you
4 were in Pennsylvania, did you go door to door?

5 A. Some of it was door to door, yes.

6 Q. How else did you collect signatures?

7 A. We would just walk up to people and ask them if
8 they were a registered Democrat --- registered
9 Democrat, that was our pitch.

10 Q. Okay. And what about for Cruz? I assume you
11 didn't use that pitch for Cruz.

12 A. Surely not. You know, again, this is from a
13 certain district, petitions in a certain district, you
14 know, so we had a door-to-door app that we would use,
15 iWalk360, and it would tell us the different Republican
16 doors that we needed to knock on or likely Republican
17 voters. Yeah, that's how we knew where to go.

18 Q. So you, as a petition collector, went either door
19 to door or walk up to people, depending on which
20 campaign it was, and asked people to sign the petition
21 for either Cruz or De La Fuente?

22 A. Correct.

23 Q. And if the person so inclined, they would sign the
24 petition for either Cruz or De La Fuente?

25 A. Correct.

1 Q. And then you'd move on to the next person?

2 A. Uh-huh (yes).

3 Q. And that process kept going?

4 A. Yes.

5 Q. Okay. Can you give me a sense as to how many
6 signatures you got for Cruz?

7 A. Not very many. It was very difficult. We were
8 working with Amy Strauss, our only available witness.
9 And she was ---. I don't know how to ---. She was a
10 little crazy. We would go to the doors and knock on
11 the doors. And, you know, it's her job to ---. You
12 know, we would knock on the doors, you know, and say,
13 hey, you're the next listed on the registered
14 Republican voters. You know, we're here collecting
15 signatures to get Ted Cruz on the ballot in the
16 Republican Primary, could you help us with your
17 autograph real quick? And whatever --- you know,
18 whatever they said to our original pitch, we just have
19 to --- you know, like a natural salesman, try to battle
20 through the objections.

21 Our witness, though, she was not interested in
22 getting a lot of signatures. She was not motivated by
23 each signature to get the petition filed. The first
24 sign of rejection, walked away. Like, you know, it
25 made the job impossible to do. It was tragic.

1 Q. You did collect some signatures for Cruz; correct?

2 A. Some.

3 Q. And as it relates to De La Fuente, did you collect
4 signatures for De La Fuente?

5 A. Yes.

6 Q. Were you able to get the signatures for Cruz
7 notarized?

8 A. Yes.

9 Q. Were you able to get the signatures for De La
10 Fuente notarized?

11 A. Yes. But it was not until at the ---. So we were
12 working with a witness, Kemitt Wilson, and he was in
13 his 70s. He was the only guy that we could find to
14 work with ---. You know, there was only one other
15 person that we knew in the state and it was his cousin.

16 The witness was the cousin of this guy Darrell Bonner
17 (phonetic) that we --- a friend of a friend kind of
18 thing. And this guy, he had a ---. He was in his 70s.

19 One day we were out petitioning and, you know,
20 chasing everybody down. And he got very tired. And,
21 you know, he would have to take frequent breaks. And,
22 you know, I was just at the whim of his abilities and
23 it made the job very difficult.

24 Q. Did you reach out to anybody in the Cruz campaign
25 to ask them to put you in touch with a volunteer?

1 A. Well, the Cruz are Republicans, so ---.

2 Q. Yeah, I'm going with the Republican one first,
3 then we'll talk about De La Fuente.

4 A. Oh, I thought we were talking about De La Fuente.

5 Q. We were, but ---.

6 A. Oh, well ---.

7 Q. You had Amy Strauss for the Cruz ones, if I
8 understood you correctly?

9 A. Correct.

10 Q. Okay. Did you reach out to the Cruz campaign to
11 try to get anybody?

12 A. We reached out to Trent. He put ads up on
13 Craigslist, I believe. He tried to find us new
14 witnesses and he couldn't within the district. I
15 believe the ruling is something like --- correct me if
16 I'm wrong, that the witness has to be from the district
17 --- is that correct? Where we're gathering the
18 signatures from or we just couldn't find somebody. It
19 was difficult.

20 Q. All right. I'm going to ask you again, because
21 that wasn't my question. My question was, did you
22 reach out to anybody from the Cruz campaign to try to
23 get help?

24 A. Oh, no.

25 Q. Did you reach out to anybody from the De La Fuente

1 campaign to try to get help?

2 A. No.

3 Q. Okay.

4 A. The only contract ---. You know, the De La Fuente
5 campaign, they're running --- you know, Cruz campaign,
6 they're a big campaign and running, you know, stuff all
7 over the country. You know, I went to Benezet to try
8 to get help with that, rather than try to reach out to
9 the presidential campaigns.

10 Q. Okay. After Pennsylvania, you said you went to
11 Rhode Island to collect signatures?

12 A. Yes.

13 Q. And how long were you in Rhode Island for?

14 A. Oh, a matter of days. It was a very quick
15 petition. We were helping them out at the end of their
16 drive.

17 Q. Was that through Benezet?

18 A. That was through Alex Arsenault.

19 Q. And I'm sorry, was Vermont through Benezet?

20 A. Yes.

21 Q. And Pennsylvania was through Benezet?

22 A. Yes.

23 Q. So how long were you in Rhode Island for?

24 A. A matter of days.

25 Q. Beginning of the month, end of the month, middle

1 of the month?

2 A. I honestly don't remember what part of that month
3 I was in there. I've worked so many jobs. I remember
4 I did work in Rhode Island after I worked in
5 Pennsylvania. I really can't tell you what month it
6 was. I did take some time off. It's difficult for me
7 to recollect all these different petition drives, I do
8 so much work.

9 Q. That's fair enough. And I'm just trying to get
10 your best recollection. For the work you do, whether
11 it's for Benezet or Alex --- Arsenal?

12 A. Arsenault.

13 Q. Arsenault. Regardless of who the contractor is,
14 you get paid by the signature?

15 A. Arsenault pays me by the signature when I
16 circulate for him. I also manage his petition office,
17 do validation of the signatures on various petition
18 drives. I coordinated a petition drive for Rocky De La
19 Fuente in New Hampshire, you know, paid out the
20 signature gatherers myself, you know, and filed those
21 petitions myself. So he paid us hourly for that.

22 Q. Okay. Well, we're talking about petition ---?
23 When you're actually out there on the pavement getting
24 signatures, though, you're paid for every signature you
25 get?

1 A. Correct, paid by the signature.

2 Q. So if you're not out working ---? Like you said,
3 you took some time off. If you're not out there
4 working to collect signatures, you're getting no money
5 for signature collecting?

6 A. Correct.

7 Q. And on an annual basis, is the majority of your
8 income through petition signature collection work?

9 A. It has been for the past couple of years, since I
10 ceased to work at Goji, Consumer United.

11 Q. When you were working in the insurance business
12 for that couple of years, I take it by some of the
13 dates you also collected signatures during that time
14 frame?

15 A. Not really.

16 Q. Okay. So you really only became a professional
17 signature collector after leaving the insurance
18 business?

19 A. Yes, well, before I came onto the insurance
20 business and after I left the insurance business.

21 Q. Okay.

22 A. Yeah, I didn't work on much of anything
23 signature-gathering-wise. I was offered various jobs,
24 but I don't know, nothing really got me interested for
25 me to give up my free time on a Saturday to go out and

1 petition, you know.

2 Q. So I have written down that you ended with the
3 insurance business in January of 2015. So is it fair
4 to say that January 2015 forward is when you've been a
5 professional signature collector?

6 A. I actually was looking for a job for a few months.
7 You know, I went on unemployment and I was offered a
8 job petitioning and my girlfriend was offered a job
9 managing the petition office and validating signatures
10 in California.

11 Q. And did you take that job?

12 A. Yes.

13 Q. Okay. When was that?

14 A. May 2015.

15 Q. Did you have to move to California for that?

16 A. Actually, I lived in a hotel. I believe the law
17 in California is that you technically become a resident
18 after 30 days of living there, but I ended up ---. To
19 try to save money from going to hotels, because that
20 gets quite expensive, I got a room in a lady's house
21 for a month in August to September --- middle of August
22 to middle of September.

23 Q. Were you collecting during that time or ---?

24 A. We were. I was collecting for a couple of weeks.
25 But my girlfriend needed a lot of help, once Alex had

1 left us in charge to run his office for him while he
2 went on vacation to Europe.

3 Q. And where's Alex's office?

4 A. At that time ---. Well, Alex has an office in
5 Woburn that we use when we're running petitions in
6 Massachusetts, but at that time he was also running an
7 office in Richmond, California.

8 Q. So you went and worked for Arsenault, is that how
9 you got into this?

10 A. I got into this is 2007 in the very beginning. We
11 were petitioning to get a question on the ballot in
12 Massachusetts to end the income tax ---.

13 Q. Okay. You mentioned that, but I'm looking at ---.
14 My question might not have been clear. When you really
15 started this as your career, that's what I really want
16 to know about.

17 A. That's kind of how I started it as a career. It's
18 something that I returned to after my insurance job had
19 ended.

20 Q. Okay.

21 A. So it's something that I ---. You know, it's a
22 gig that I had, you know, between --- a recurring gig
23 that I had between 2007 to 2012. And, you know, it
24 took up again in 2015.

25 Q. Okay.

1 A. But, you know, I had known Alex. I believe I met
2 him in 2012. Yeah, I met him in 2012 in November
3 and --- or was it in 2011 --- maybe '13. Yeah,
4 actually --- yeah, it was at the end of the
5 Massachusetts drive in 2012 I met Alex. And there was
6 a lot of --- you know, not a lot of work for
7 petitioning, because it's a seasonal job. So at the
8 end of that season, I took up --- you know, I got hired
9 with Consumers (sic) United.

10 And in the meantime, my girlfriend, Carolyn, had
11 helped him do validity on some contracts he was doing
12 in the Boston election. It was a Boston mayor election
13 that she worked on. And, you know, Alex had known
14 Carol and I, you know, as petitioners and as, you know,
15 people help out in the back office.

16 Q. Okay. Where did you go after Rhode Island, then,
17 to collect in 2016?

18 A. This year. I was in ---. We went to Connecticut.
19 Yeah.

20 Q. And how long were you in Connecticut for?

21 A. Again, a few weeks.

22 Q. Who did you collect for?

23 A. Rocky. We were doing Rocky.

24 Q. And was that to get on the Democratic Primary
25 ballot?

1 A. Yes, that was to get on the Democratic Primary
2 ballot. Yeah, it must have been between ---. Yeah,
3 this period of time after Pennsylvania was between May
4 --- I'm sorry, March and April, because we started
5 beginning doing Massachusetts in the middle of May or
6 so, beginning or middle of May.

7 Q. So you were in Connecticut for a few weeks doing
8 petition collection --- signature collection for Rock
9 De La Fuente and that was March and April?

10 A. Yeah. We did Rhode Island and Connecticut.

11 Q. When you were doing the Connecticut collection,
12 did you stay in Connecticut for that period of time?

13 A. Not always. I did, you know, drive back and forth
14 from Massachusetts to there every now and then. I
15 mean, it's only an hour and a half drive.

16 Q. How much of the time were you in Connecticut
17 versus how much of the time were you back in
18 Dorchester, your house?

19 A. Most of the time I was in Connecticut.

20 Q. Were you staying at various hotels throughout the
21 state, one location?

22 A. I think just one, Hampton Inn.

23 Q. Were you collecting at various locations across
24 the state?

25 A. You know, actually, I think I just worked

1 Connecticut for a couple of days, now that I think
2 about it. We were helping them do the wrapping
3 up ---. Yeah, because I wanted to take some time off
4 to go skiing. I had a bunch of money from my previous
5 efforts. And so I like to take time off in the winter.
6 Yeah. So I worked with Rocky in Connecticut for a few
7 days. And then after we had helped Alex file the
8 petitions and drove out to all the towns in
9 Connecticut, because that's what you got to do there.

10 Q. You have to drive to each town and submit the
11 petition?

12 A. Yeah.

13 Q. Okay.

14 A. Yeah, it's terrible. Yeah, I had to do the same
15 thing in New Hampshire. Every town has to have its own
16 page. Actually, in New Hampshire, every signature has
17 its own page.

18 Q. Really?

19 A. Yeah.

20 ATTORNEY ROSSI:

21 We will concede that there were states
22 worse than Pennsylvania.

23 A. Yeah, but they don't require you to have a
24 witness.

25 BY ATTORNEY JOEL:

1 Q. So where did you go after Connecticut?

2 A. Back to Massachusetts. Yeah.

3 Q. To collect signatures?

4 A. To collect signatures, yeah. There was an interim
5 period, I believe, where there was not much work and
6 work began in Massachusetts in May. And May we did the
7 ballot question petitions and Carol and I did the
8 validity on all those petitions.

9 Q. But in terms of signature collection, you
10 collected signatures for a ballot question in
11 Massachusetts?

12 A. Yeah. Three questions.

13 Q. I'm sorry, two questions?

14 A. Three of them.

15 Q. Three of them. And while you were doing that work
16 in Massachusetts, were you staying at your house?

17 A. Yeah.

18 Q. The whole time or did you ever go out to the
19 western part of the state and try to collect?

20 A. You know, there was a couple of times where, you
21 know, we went on like day trips to the Cape. I don't
22 think we stayed anywhere else. I'm trying to think. I
23 might have stayed at my dad's house once. My dad lives
24 in North Falmouth, if you remember previously.

25 Q. Uh-huh (yes).

1 A. The entire time we were either in Dorchester or
2 --- yeah, my dad's house. We might have stayed at a
3 friend's house.

4 Q. How about after ---? So that was May?

5 A. Uh-huh (yes).

6 Q. Back me up for a second. And if it's different
7 for any of the states, let me know. But maybe a more
8 generalized question to ask is, when you're out
9 collecting these signatures, are you starting first
10 thing in the morning, going until midnight or are you
11 going until 7:00 at night? What's your normal day
12 like?

13 A. That's a fair question. Usually what I'll so is
14 I'll look at Google Maps. And Google Maps is really
15 cool. It has popular times of certain places. Because
16 in Massachusetts, they have a law that allows for
17 signature gatherers to petition in front of
18 privately-owned supermarkets. It's been fought in
19 numerous court cases and won, where I can, you know, go
20 to a supermarket and petition there all day. So I'll
21 look at the busy hours on Google Maps of when the
22 stores are the busiest and form what my plan of the day
23 is going to be around that.

24 Q. So you're looking at information such as that to,
25 I guess for lack of a better phrase, maximize your

1 efforts?

2 A. Absolutely. I get paid as many ---. I get paid
3 by the signature, so I want to get paid as much as
4 possible.

5 Q. Okay. So you want to get as many signatures as
6 possible because you get paid more that way?

7 A. Yeah.

8 Q. Where did you go after Massachusetts ---? Oh, I'm
9 sorry. In Massachusetts, did you do any collection for
10 any candidates or was it just the ballot questions?

11 A. Well, by the time they were petitioning for the
12 candidates, I had to work in the back office with Alex
13 and help him coordinate.

14 Q. So you didn't collect any for candidates in
15 Massachusetts?

16 A. No.

17 Q. Okay. Where did you go after Massachusetts?

18 A. We worked in Massachusetts. Let's see, yeah,
19 pretty much all of May was petitioning and validating.
20 Then we filed Massachusetts. We had to go out to
21 Western Mass to go --- that's where this other guy, Jim
22 Fleming, is our contractor out in Western
23 Massachusetts. We had to sort all of the petitions,
24 mail them out. It's a lot of work to get something on
25 the ballot up there. So, yeah, we did that.

1 After that was over, we did ---. I didn't do any
2 of the petitioning, I just worked in the back room. We
3 were doing a local effort in Revere to expand the
4 Gaming Law. So we were working on that in the back
5 office, validating all the signatures that came. And
6 on that campaign, we were validating ---. Yeah, also
7 simultaneously, Alex was working in Connecticut and
8 Massachusetts and that's --- and maybe Rhode Island. I
9 don't know, that's Alex's work, obviously.

10 Right. What was the question? I'm sorry.

11 Q. The question was where did you go to collect
12 signatures, if you went to anyplace else after you
13 finished in Massachusetts with the ballot questions?

14 A. Oh, no, I didn't after the ballot questions. I
15 just primarily managed and coordinated petition drives
16 for Alex.

17 Q. So you didn't go to any other states and collect
18 signatures in June or July or August or September?

19 A. I went to other states to coordinate petitioning,
20 but didn't actually circulate myself.

21 Q. Okay. Let's come back to that in a second. You
22 mentioned a couple of times validating signatures.
23 What's involved in that?

24 A. Oh, you've got to make sure the signatures are
25 valid with a voter registration list. So we buy a file

1 from the Secretary of State's Office with a list of
2 voters and we put it into a spreadsheet. And every
3 single signature that comes in, we check against that
4 list to see if they're valid, so that we know when we
5 file the signatures that they are going to be on the
6 ballot.

7 Q. And do you do that for all of the drives that
8 you're talking about? In Vermont, did you do that?

9 A. Only when it's paid ---. Only when the proponent
10 specifically requests it. We don't always validate.
11 Sometimes you just turn them into the town clerks and
12 then the town clerks will let us know what the validity
13 percentages are and how we're doing on that.

14 Q. How are they done in Pennsylvania?

15 A. I don't know.

16 Q. Okay. You didn't have any role in the validation
17 process ---?

18 A. Not at all.

19 Q. So you talked about after --- in June moving
20 forward, you went to various states to manage
21 collection drives. Where did you go?

22 A. We did New Hampshire. Yeah. That was primarily
23 my project up in New Hampshire, yeah. After we
24 finished Massachusetts, we were getting Rocky on the
25 ballot in New Hampshire and Alex was doing the other

1 states.

2 Q. And what did you do as it relates to managing
3 these signature collections ---? What was your ---?

4 A. Well, Alex and I helped recruit the petitioning
5 team. You know, we told the petitioners where to
6 petition. We printed out the paper for the
7 petitioners, made sure they had plenty of paper. I
8 went up and bought the signatures from the petitioners
9 and organized ---.

10 Q. What does that mean?

11 A. I paid the petitioners for their signatures.

12 Q. You paid the registered voters signing or the
13 people collecting signatures?

14 A. No, no, no, no. The petition gatherers would
15 report to me at specific times of the week, in which I
16 would pay them for their signatures that they brought
17 me.

18 Q. Okay. And how much were you paying per signature?

19 A. \$5 for Rocky signatures. We did buy a small
20 amount of Gary Johnson signatures. I guess Alex was
21 helping out some friend or something, I'm not sure what
22 the deal is.

23 Q. Do you remember how much you were getting per
24 signature in Pennsylvania, for the work you did?

25 A. I do not remember. At least \$8 a signature. And

1 they're paying my expenses.

2 Q. So Benezet covered the expenses, you didn't have
3 to do that?

4 A. Yes. I invoice Benezet my expenses, parking,
5 gasoline, rental cars, hotels.

6 Q. And how about the ---? Did you have to pay any of
7 the witnesses that were coming along with you or no?

8 A. That was handled through Trent.

9 Q. So you had no involvement with that?

10 A. That's not true also. We went to go ---. Okay.
11 So we went to go turn in the signatures, it was the
12 deadline ---.

13 Q. Which one, Cruz or Rocky?

14 A. Rocky.

15 Q. Okay.

16 A. Yeah, Rocky we were working in Philadelphia. And
17 we were going to ---. We had collected all the
18 signatures, myself and Brian Lyra ---.

19 Q. Do you know how many you had collected?

20 A. I cannot give you an accurate number now.

21 Q. Can you give me a range?

22 A. I don't know. I really can't, sir.

23 Q. That's fine. That's fine.

24 A. I could tell you we had at least ---. I don't
25 know, we got maybe --- probably a hundred signatures a

1 day for --- at least a hundred signatures a day for a
2 couple of weeks. I mean, there were many signatures,
3 at least a thousand. At least a thousand, not a lot
4 more.

5 Q. And we're talking about for De La Fuente?

6 A. For De La Fuente.

7 Q. Okay.

8 A. That myself and Brian Lyra personally collected.
9 And yeah, and so ---.

10 Q. And that was with having the Pennsylvania witness
11 with you?

12 A. The witness was with us, yes. He followed us
13 around. He sat down while we petitioned in the
14 corridors of the subways. There's a strip mall inside
15 of the --- I think it's what, City Center it is, in
16 Philadelphia that we were in the corridors. And he was
17 just sitting there. And the end, our witness had ---.
18 He had stopped us. He was trying to collect more money
19 than he was owed on ---. He said that he wasn't going
20 to get the signatures notarized unless we paid him much
21 more than what the contract was for.

22 Q. Who was that? Who's the witness?

23 A. Kemitt Wilson. He extorted us and extorted the
24 campaign at the end of the drive.

25 Q. Did you have to sign it?

1 A. Yes. Yes, he and Trent came upon an agreement and
2 we had to get them notarized. He held us over a
3 barrel.

4 Q. So if I understand you correctly, you had, at
5 least for De La Fuente, collected, you believe, over a
6 thousand signatures ---

7 A. Yes.

8 Q. --- with the Pennsylvania witness; correct?

9 A. Yes.

10 Q. And the affidavit was signed and it was notarized;
11 correct?

12 A. Yes.

13 Q. And it was turned in?

14 A. Correct.

15 Q. Okay. How about with Cruz? Can you give me any
16 sense as to how many signatures you got in Pennsylvania
17 for Cruz?

18 A. It was less than 500. It was very difficult. The
19 woman, Ms. Strauss, she was --- she would not do the
20 job. She didn't work out. We tried to find another
21 witness and failed.

22 Q. And by not do the job, do you mean what you
23 testified before that, you know, if somebody said
24 no, ---

25 A. Yeah, she just ---.

1 Q. --- she wouldn't give them the hard sell to try to
2 get ---?

3 A. Not at all. Not just not give them the hard sell,
4 she would just walk away. Oh, okay. She was that
5 crazy. I don't know if she was on like prescription
6 medication or, you know, I don't know where we found
7 this lady, but she was terrible.

8 Q. Who put you in touch with the lady? Was it Trent?

9 A. Trent had recruited her.

10 Q. And you have no knowledge of whether she was on
11 prescription medication, you're just speculating?

12 A. I'm just speculating, yeah. I don't know. She
13 was nuts.

14 Q. Okay. So you were managing in New Hampshire?

15 A. Uh-huh (yes).

16 Q. When you were managing in New Hampshire, were you
17 staying in New Hampshire to do that work or did you
18 commute back and forth?

19 A. Commute back and forth.

20 Q. Okay. For the whole time?

21 A. Yes.

22 Q. All right. Where did you go after New Hampshire
23 to manage?

24 A. After New Hampshire wrapped up, I was
25 notified ---. This is still ongoing in Connecticut. I

1 have to ---. Are you aware what's going on in
2 Connecticut?

3 ATTORNEY ROSSI:

4 Yes, I do, but I'm not testifying.

5 A. All right. So after Connecticut ---. After New
6 Hampshire I was then tasked to ---. Rocky didn't get
7 enough signatures in Massachusetts to make the ballot.
8 He didn't have enough ballot signatures.

9 BY ATTORNEY JOEL:

10 Q. How many do you need in Massachusetts?

11 A. 10,000.

12 Q. You need 10,000? Okay.

13 A. Yeah, we had 7,000 signatures in Massachusetts.

14 Q. Okay. And was that for the Democratic ---?

15 A. 7,000 valid signatures.

16 Q. Was that for the Democratic Primary?

17 A. He got on the ballot in the Democratic Primary and
18 he ran again as an Independent candidate.

19 Q. So he needed --- so he got on it as a Democrat on
20 the Primary ---

21 A. Uh-huh (yes).

22 Q. --- in Massachusetts, he lost. He then got on ---
23 or he tried to get on as an Independent in the General?

24 A. Correct.

25 Q. The General hasn't happened yet, but he's trying

1 to get on the General Election ballot for this
2 November. He needed 10,000 signatures to do that, he
3 didn't get that many?

4 A. Correct.

5 Q. Okay.

6 A. Yes. Another person that we had a contract that
7 Alex --- or Benezet had contracted with screwed up,
8 basically.

9 ATTORNEY JOEL:

10 We'll take a couple minutes. I've got to
11 respond to an e-mail.

12 SHORT BREAK TAKEN

13 BY ATTORNEY JOEL:

14 Q. Okay. Mr. Alexander, where else did you manage
15 collections other than New Hampshire as you move
16 forward through today in 2016?

17 A. That was the only state where I managed the
18 collection of signatures since then. We also did the
19 same thing in California last year. But since New
20 Hampshire, I have not paid for any signatures on behalf
21 of Alex, but we've just been doing other work.

22 Q. And since then, have you ---? If I understand you
23 correctly, you haven't been out collecting any other
24 signatures?

25 A. No.

1 Q. As part of your job with Alex, do you recruit
2 signature collectors in various states wherever you're
3 working?

4 A. We've tried. Not frequently. Usually our
5 recruiting is something that Alex does. I just operate
6 Alex's business on his behalf or work in the back room,
7 you know, doing tasks that he puts me at.

8 Q. Do you know ---? Are you aware, given the nature
9 of your work, of any professional signature gatherers
10 who are residents of Pennsylvania?

11 A. I know of one.

12 Q. Okay. Who's that?

13 A. Darrell Bonner.

14 Q. And does Mr. Bonner have his own business or ---?

15 A. I don't know.

16 Q. So you don't know if he's like an at-will
17 freelancer like you are or not?

18 A. I would describe him as such.

19 Q. How would you describe him?

20 A. As a freelancer like myself.

21 Q. Okay. Now, did you --- before ---? Let me just
22 get at it this way. Going back to 2012, did you
23 collect signatures in Pennsylvania for the Ron Paul
24 campaign?

25 A. I did.

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ATTORNEY JOEL:

And we'll mark that one as Defendants 1,
I guess.

(Defendant Exhibit 1 marked for
identification.)

BY ATTORNEY JOEL:

Q. I'll show you ---. And I'll make a copy of it,
you can look over. I'll get you a copy, before you go,
of what's been marked as Defendant's 1. Is that an
e-mail string back and forth between you and Mr. Pool?

A. Yes.

Q. And did you write back to Mr. Pool, yeah, Carol
and I rocked PA four years ago for Ron Paul. We made a
bunch of cash blast in Philly, let's do this thing?

A. That is me.

Q. Okay. So back in 2012 you collected signatures in
Pennsylvania for Ron Paul?

A. Yes.

Q. Did you collect for any other candidates in the
2012 cycle, in Pennsylvania?

A. They were delegates to the Republican National
Convention, much as they were delegates for the
Republican National Convention when I circulated for
Mr. Cruz.

Q. Did you circulate any petitions for delegates for

1 Mr. De La Fuente this time around in Pennsylvania or
2 was it just for Mr. De La Fuente?

3 A. I do not recall. I'm in the top of the ---. I
4 don't know if they were Rocky delegates or not or if
5 they were just for Rocky's name on the ballot. I do
6 remember that the Ted Cruz one was for each delegate.
7 And I believe the ones we did for De La Fuente in PA
8 were for just Rocky to be on the ballot.

9 Q. Okay. Thank you. So back in 2012 you came to
10 Pennsylvania; correct?

11 A. Uh-huh (yes).

12 Q. And you collected signatures; correct?

13 A. Yes.

14 Q. And at least by that you made a lot of money, so
15 you must have collected a lot of signatures?

16 A. It might have been a blowup, like, hey, this is
17 --- yeah, I didn't ---. We did make a bunch of cash in
18 Philly.

19 Q. And I presume that in 2012 you had a witness
20 accompanying you; correct?

21 A. Yes, we worked with the delegates themselves.

22 Q. And in 2012 you had to have all of your petitions
23 notarized; correct?

24 A. Well, I worked with the delegates and they got
25 them notarized.

1 Q. Okay.

2 A. Yeah, one day I did emergency petitioning in
3 Philly. They needed delegates there and we partnered
4 with them.

5 Q. Have you collected signatures for any other
6 election, whether it's local, presidential, senatorial,
7 gubernatorial, whatever the case may be in
8 Pennsylvania, other than 2012 for Ron Paul and 2016 for
9 Cruz and De La Fuente?

10 A. I don't think so.

11 ATTORNEY JOEL:

12 Mark that as Defendant's 2, please.

13 Thanks.

14 (Defendant Exhibit 2 marked for
15 identification.)

16 BY ATTORNEY JOEL:

17 Q. I'm showing you what's been marked as Defendant's
18 2. As part of our gathering today, you received a
19 subpoena to produce various documents, you remember
20 that?

21 A. Yes.

22 Q. And this is what we got in response, and I had a
23 question. One of the things in there looks to
24 be ---. Take as much time and look through the whole
25 thing if you want, but ---.

1 A. Excuse me, this is the one I e-mailed you?

2 Q. Uh-huh (yes). What I'm really ---. My questions
3 are about, it looks like there's an example of a
4 contract between you and Benezet. If you could find
5 that, I just have a couple of questions about that.

6 A. Yes.

7 Q. Okay. Do you have other contracts for other
8 campaigns, because I thought this one only went for a
9 limited time period?

10 A. This was the contract for Vermont.

11 Q. That's the contract for Vermont?

12 A. Yes. Yeah, 12/8.

13 Q. And do you not have subsequent contracts when you
14 went to Pennsylvania to collect, for example, or Rhode
15 Island or wherever it was?

16 A. I do not have contracts?

17 Q. Okay.

18 A. I do not have copies of them.

19 Q. Did you ever have a contract or you just don't
20 have copies of them or did you not enter into a
21 contract with Benezet for that work?

22 A. I did not ---. I'm not sure if this contract
23 covers me or I actually ---. Restate the question?

24 Q. Yeah. You just said that this was for the Vermont
25 work that you did?

1 A. Yeah. I signed this before working for Benezet in
2 Vermont.

3 Q. Okay. My question is, is there a similar one to
4 cover you for Pennsylvania or for Rhode Island or for
5 Massachusetts or for any of the other work that you did
6 for Benezet or not?

7 A. I don't see any expiration date. I guess,
8 attachment A. Oh, yes, I see what you're saying.

9 Q. Yeah. It looked like there was a contract term of
10 November of '15 through January of '16.

11 A. That's about right.

12 Q. For Vermont?

13 A. So that's right.

14 Q. Okay. So is there a subsequent contract for
15 Pennsylvania or for any other work you did for Benezet?

16 A. No.

17 Q. Okay. So all the other stuff was just Trent
18 picking up the phone and saying, can you help out here,
19 can you go here, can you work for me here?

20 A. Yeah. Trent, he e-mailed me and said, hey, I need
21 your help in Pennsylvania, ---

22 Q. Okay.

23 A. --- come out and do this.

24 Q. One of the things at issue in this case is the
25 inability of electors to sign more than one petition.

1 I'm not sure if you know that or not.

2 A. Uh-huh (yes).

3 Q. My question is, when you collected for Ron Paul in
4 2012 you were aware that you couldn't have people sign
5 multiple petitions?

6 A. Yeah.

7 Q. Okay. How did you check that? Did you just ask
8 them or what did you do?

9 A. I asked them or I would say ---. I don't know.
10 It was a long time ago. I don't remember what my pitch
11 was.

12 Q. Okay. But regardless of that you were able to
13 collect those signatures?

14 A. Yeah.

15 Q. And you were able to collect signatures regardless
16 of that in 2016 for De La Fuente or Cruz?

17 A. Yeah. I figured that, you know, usually if the
18 person had signed that they should know what they're
19 signing, you know?

20 Q. And whether it was for Alex or not, have you
21 recruited others to be circulators, petition gatherers?

22 A. I have recruited my friends, ---

23 Q. Okay.

24 A. --- such as Brian Lyra.

25 Q. Okay.

1 A. Carol. She's not much of a signature gatherer.
2 She kind of just, you know, helps out behind the
3 scenes.

4 Q. Okay. And just to make sure I'm clear, your
5 signature gathering has been only through Benezet or
6 Alex?

7 A. Since 2015.

8 Q. Okay.

9 A. Yes.

10 Q. Who did you do it for in 2012? Was that for
11 Benezet also, for the Ron Paul campaign or ---?

12 A. The Ron Paul campaign was managed by a gentleman
13 named Andy Jacobs, who, actually, I believe also is
14 from Pennsylvania, now that I think about it.

15 Q. Okay. All right. Mr. Jacobs.

16 A. Sorry. Okay. Sorry.

17 Q. I believe you're correct and we'll ask him when we
18 speak to him later this week, but I believe you're
19 correct.

20 A. Yes, yes. I have been ---.

21 ATTORNEY ROSSI:

22 That's where the notice went to.

23 A. Well, you know, they did send me a notice to South
24 Dakota.

25 ATTORNEY JOEL:

1 Well, that's the address we have.

2 ATTORNEY ROSSI:

3 That's not their fault and I explained
4 that to you. We tried to give you long enough ---.

5 A. Right, right, right.

6 BY ATTORNEY JOEL:

7 Q. So your work in 2012 for Ron Paul was through Andy
8 Jacobs?

9 A. Yes.

10 Q. Okay. And does Andy Jacobs own his own business,
11 like Benezet or what's his mode of operation?

12 A. I don't know.

13 Q. To the best you know.

14 A. He's an independent contractor.

15 Q. Okay. Did you reach out to Andy Jacobs at all in
16 2016 to be your witness for either De La Fuente or
17 Cruz?

18 A. From what I understood he was also petitioning for
19 Cruz in his district and was already busy with, you
20 know, collection.

21 Q. So the answer is no, you didn't?

22 A. I did not.

23 Q. Okay.

24 A. I believe Mr. Jacobs is a contractor with Benezet,
25 so --- or he is contracted with Benezet, so I generally

1 go to Trent for that type of help.

2 Q. Okay.

3 A. And he allocated me to go out to Philly.

4 Q. Okay. And to go to District 8 for Cruz in
5 Philadelphia for De La Fuente?

6 A. Correct.

7 Q. When you were doing the Cruz work, was that on
8 behalf of Benezet also?

9 A. I believe so.

10 Q. In 2016?

11 A. Yes.

12 Q. Okay.

13 A. Yeah. I haven't helped Cruz run for president any
14 other year.

15 Q. I don't think he's run in any other year.

16 A. Me. I didn't help get on the ballot for senate.

17 Q. Okay.

18 A. May I break for a moment to use the bathroom?

19 ATTORNEY JOEL:

20 Yeah. Go ahead.

21 A. Be right back.

22 SHORT BREAK TAKEN

23 BY ATTORNEY JOEL:

24 Q. If we're talking about 2016 ---? Actually, let me
25 ask this. 2012 you talked about collecting signatures

1 for Ron Paul. Did you do any other collection work
2 that year?

3 A. Yes.

4 Q. When and for whom?

5 A. Oh, my.

6 Q. And where?

7 A. Let's see. That was a really busy year again.
8 The end of 2011. Yeah. Where do you want me to start,
9 because I worked from ---?

10 Q. Whatever that election cycle would've been.

11 A. Okay. So in about September of 2011 to October of
12 2011 I worked in Massachusetts while flying four
13 different ballot questions.

14 Q. Okay.

15 A. You know, out collecting the signatures.

16 Q. Collecting signatures?

17 A. Collecting signatures, yeah. That was pretty
18 much. I didn't do any office work. They are ---

19 Q. Okay.

20 A. --- conflicts of interest. Yeah. I did the four
21 ballot questions in Massachusetts. I did a petition
22 for an American Elect Party in Rhode Island in late
23 November.

24 Q. What's the American Elect Party?

25 A. A third political party or just another

1 independent.

2 Q. And what was that? What were you trying to get
3 them on the ballot for?

4 A. Just for party representation.

5 Q. Okay. So no specific candidacy?

6 A. Yeah. It was a new political party, which they
7 were going to draw their own nomination, much like the
8 Democrats and Republications ---

9 Q. Okay.

10 A. --- were preparing. But I don't think they ended
11 up running a candidate in most of that election ---

12 Q. Okay.

13 A. --- cycle.

14 Q. Where else did you work in that election cycle?

15 A. Then after that was finished up we did petitions
16 for after Christmas. I went to Indiana and petitioned
17 for Ron Paul. We certified Ron Paul on the ballot in
18 three or four congressional districts, I believe. And
19 then we went to ---.

20 Q. You said post Christmas. What months were you in
21 Indiana?

22 A. December and January.

23 Q. So December of 2011 and January of 2012?

24 A. Correct.

25 Q. Okay.

1 A. Correct.

2 Q. Okay. Where did you go after that?

3 A. And after that we went to Pennsylvania.

4 Q. And we talked about that. Did you collect for
5 anybody other than Ron Paul?

6 A. Well, actually, no, we just did Ron Paul. Again,
7 we had a difficult time finding witnesses. My
8 girlfriend had friends who live on the western side of
9 the state, but they're nonvoters and I tried to commit
10 some to register to vote, but they were stubborn and
11 they did not register to vote in time to be witnesses
12 for me.

13 Q. Okay. And that's the collection where you made
14 big money?

15 A. Well, I didn't make really great money. The
16 reason why it was good money is because they were
17 paying for all of our expenses.

18 Q. Okay.

19 A. So the problem with petitioning is you rack up a
20 bunch of expenses. The petitioning itself was pretty
21 good. We were paid --- I believe it was \$3 a
22 signature, which was a lot more than we were getting
23 paid in Massachusetts at the time for a petition. Each
24 signature was a dollar in Massachusetts. But when we
25 went out of state the signatures were much more

1 valuable and, you know, the Paul campaign, you know, I
2 just submit my expense reports to them and they would,
3 you know, either buy my hotels or I'd submit expense
4 reports to them and the Paul campaign would reimburse
5 Andy, who would reimburse me.

6 Q. Okay.

7 A. It was all right. We did okay.

8 Q. Well, according to your e-mail you made big money?

9 A. I did make big money.

10 Q. Okay. Fair enough. Did you collect for anybody
11 else in Pennsylvania during that cycle or just Ron
12 Paul?

13 A. Just Ron Paul.

14 Q. Okay. Where did you go next?

15 A. Yeah. After Pennsylvania we were ---. We went to
16 South Dakota for a week to do Americans Elect. And
17 that was a horrible experience. And I left and worked
18 in Oregon, and stayed out in Oregon for quite a while.
19 Yeah, we were there until May. That's right. We were
20 there for May --- until May, and then we came back out
21 to Massachusetts. And we did the petitioning in
22 Massachusetts, for ---. See Massachusetts has two
23 rounds of petitioning.

24 Q. Okay.

25 A. In the fall they have to get 6,000 to 8,000 ballot

1 signatures and in the spring they've got to get 8,000
2 ballot signatures ---

3 Q. Okay.

4 A. --- per question. So we did that. When we were
5 done with that, we went to a handful of states,
6 Maryland for the Libertarian Party. We did a brief
7 stint in West Virginia for like two days.

8 Q. Who was that for?

9 A. That was for the Libertarian Party and another
10 candidate. I don't even remember who it was. I think
11 he was running for president just in that state. And
12 he only needed us for two or three days.

13 Q. Okay.

14 A. He was very high paying. But, you know, I mean
15 like \$3 a signature, which was unheard of back in those
16 days.

17 Q. Okay. Back to West Virginia?

18 A. Back to Maryland. Then we did ---.

19 Q. This would be the second time in Maryland?

20 A. Well, we were still ---. We were doing West ---.
21 We left our job in Maryland for a day ---

22 Q. Oh, okay.

23 A. --- to go work in West Virginia.

24 Q. Okay. So then you went back to Maryland for the
25 Libertarian Party again?

1 A. Yeah. Libertarians and ---. Yeah, I think it was
2 just Libertarian ---

3 Q. Okay.

4 A. --- we were doing in Maryland. Then we left there
5 and did ---. It was Alabama straight afterwards. We
6 did Alabama. In Alabama we were there for a couple
7 months. We did Pierre Johnson, Jill Stein and Virgil
8 Goode of the Constitution Party. We were there for a
9 couple of months.

10 Q. And was Stein at that point showing for the Green
11 Party?

12 A. Yes.

13 Q. And Johnson for the Libertarians?

14 A. Yes. Although I believe they ran as Independent
15 candidates because they didn't have party access ---

16 Q. Okay.

17 A. --- in those states.

18 Q. Where after Alabama?

19 A. After Alabama we went home.

20 Q. Okay.

21 A. And I went on a job search and got my job as an
22 insurance agent.

23 Q. Is it fair to say that you are busy --- busier
24 during presidential election years?

25 A. Yes.

1 Q. Okay. On the off election years how much work do
2 you do?

3 A. Well, there was ---. 2011 was a pretty scarce
4 year.

5 Q. The 2011 election year?

6 A. Yeah. There wasn't much going on in petitioning.
7 Before November 2011 there was nothing. The end
8 of ---. After the end of 2010 and the beginning of
9 2011 I didn't work, I helped out around the house.

10 Q. Okay. How about in the 2010 election cycle?

11 A. 2010 election cycle? Goodness. Okay.

12 Q. You know what, let's strike that, because you were
13 working in insurance then.

14 So let's go forward. So 2011, we talked about
15 2012. How about the 2013 election cycle? Much work
16 then?

17 A. There was nothing ---. I didn't do any work in
18 those years because I was selling insurance between ---

19 Q. Okay.

20 A. --- 2012 ---. And I became licensed on January
21 8th, 2013. And I think I left the company on the same
22 date in 2015, now that I think about it. Yeah.

23 Q. Did you do any work in the 2014 election cycle?

24 A. No.

25 Q. 2015 election cycle?

1 A. Well, the 2015 election cycle is actually
2 still --- it's the 2015-'16 election cycle.

3 Q. No, I'm talking about an election that would have
4 been held in 2015.

5 A. I'm not sure if they were --- if the elections had
6 been held yet. Like I said, May of 2015 I traveled to
7 California and I collected signatures for ballot
8 questions there and local petitions in California.

9 Q. Okay.

10 ATTORNEY ROSSI:

11 Can you clarify? I'm think you're asking
12 for the actual --- whatever municipal elections were in
13 2015. Can you clarify that question for him?

14 ATTORNEY JOEL:

15 Sure.

16 ATTORNEY ROSSI:

17 Okay.

18 ATTORNEY JOEL:

19 Sure.

20 BY ATTORNEY JOEL:

21 Q. What I'm wondering, 2016 is the presidential
22 election year.

23 A. Right.

24 Q. I understand that some of the work for the 2016
25 general election started at the tail end of --- your

1 work started at the tail end of '15, when you were in
2 Vermont, for example?

3 A. Right.

4 Q. Okay.

5 A. But still there were some other petitions to be
6 collected. I'm not sure what date if they had already
7 obtained ballot access on which election cycle it was.
8 I believe I collected signatures for a 2016 election in
9 2015.

10 Q. Okay. That's fine. That's fine. So what I'm
11 wondering is, an election that was held in November of
12 2015. That's the election I want to talk about. Did
13 you do any work to get people or issues or parties on
14 that ballot?

15 A. I'm not sure. Like I said a moment ago, I'm not
16 sure if those questions were on a ballot yet in
17 2015 ---

18 Q. Okay.

19 A. --- or '16 in California. They could have been
20 local, municipal. I did work on three different local
21 issues in Richmond, California.

22 Q. Okay.

23 A. I was mostly managing the petition drives.

24 Q. November 2011 election, did you do any work
25 associated with that election, as it relates to

1 collecting signatures for anything?

2 A. Yes, I worked in Ohio.

3 Q. Okay. For what or for whom?

4 A. A statewide repeal of Obamacare.

5 Q. How about the 2010 ---? Did you get that work
6 through Benezet or through somebody else?

7 A. I got it from Chaz Tuttle (phonetic).

8 Q. Okay. Who's that?

9 A. Another contractor.

10 Q. Okay. Have you worked for Chaz Tuttle other than
11 that one time?

12 A. We worked with him in Wisconsin that year in 2011,
13 with the various recalls of different state senators.

14 Q. Okay. Other than those two issues, did you work
15 with Chaz Tuttle on any other election ---

16 A. No.

17 Q. --- petition gathering signature process?

18 A. He may have been a petitioner contractor with
19 another person I had been contractor with and working
20 in another part of the state unbeknownst to me. But to
21 the best of my recollection, no.

22 Q. Okay. How about the 2010 election. Did you do
23 any work as it geared up for the November 2010
24 election, in terms of signature gathering?

25 A. Yes.

1 Q. Where and for whom?

2 A. In Massachusetts for Harold Hutchman was the
3 contractor I worked for in Massachusetts, with the
4 statewide ballot questions there ---

5 Q. Okay.

6 A. --- for the 2010 collection cycle.

7 Q. Any candidates or just for ballot questions?

8 A. I believe just ballot questions.

9 Q. How about the election that would have taken place
10 November of 2009? Any work in collecting signatures
11 for anything or anybody on that ballot?

12 A. I don't remember.

13 Q. Okay. Did you receive any training to become a
14 signature collector?

15 A. Hardly.

16 Q. Hardly. Any?

17 A. I got a sheet on what to --- you know, talking
18 points on various projects that we were working on.

19 Q. Was there a different talking point sheet for
20 different projects or just a generic one that could
21 cover whether it's this candidate in Pennsylvania or
22 that question in ---?

23 A. They would give us different talking points about
24 the various ballot questions we were working on.

25 Q. Okay. You know, depending on what the question

1 was they would give us background information. But not
2 always. A lot of times I did the homework myself and
3 figured out what was going on and how to pitch it best.

4 Q. Okay. So any training on how to pitch it best or
5 just general ---?

6 A. Trial and error.

7 Q. You mentioned earlier you had some app, I don't
8 know if it was to get voters or who was registered or
9 what. What's that about?

10 A. Trent provided us with a login on iWalk 360, ---

11 Q. Okay.

12 A. --- that had a database of respective voters to
13 sign various petitions.

14 Q. And is that something that is peculiar to only one
15 state or is that ---?

16 A. We used that app in Vermont and Pennsylvania.

17 Q. Okay. And that identifies potential ---?

18 A. It didn't identify. I believe Trent or Benezet
19 had a database or I don't know maybe they got a list of
20 Republican donors. I'm not sure where they got this
21 list from ---

22 Q. Okay.

23 A. --- of perspective Republican voters that would
24 sign the petitions for Ted Cruz.

25 Q. But you were able to log onto that app somehow to

1 find out who they were and where they are and try to
2 hit them up for your signatures, was that the idea?

3 A. Yes.

4 Q. Okay. Now, you mentioned the Cruz efforts this
5 past election and the person you were teamed with not
6 giving a hard sell. Any reason why you didn't try to
7 give the hard sell? It is your job to collect
8 signatures.

9 A. I absolutely did try to get the hard sell, but,
10 you know, in a lot of cases the people had already
11 closed the door on us. You know, she would say, okay,
12 and that's it. That's all the other person needed, you
13 know? You're already on their doorstep. It's pretty
14 tough to ---. Once they slam the door and kick you off
15 the property, you know, I've got to go try again.

16 Q. Why didn't you talk first?

17 A. I usually did.

18 Q. Okay.

19 A. I would talk and pitch the person and, --- you
20 know, and they didn't sign, you know. Or a lot of
21 times the first sign of that they didn't want to sign,
22 they'd just walk away. Or a lot of times we'd knock on
23 people's doors and they just weren't home and it was
24 very difficult. There was a lot of things that, you
25 know, stopped us from doing an effective job in

1 Pennsylvania, unlike how we were able to really do an
2 excellent job like we did in Virginia --- I'm sorry,
3 Vermont.

4 Q. Okay.

5 A. You know, if it was just Brian and I being able to
6 go about and get the signatures without the necessity
7 of Amy, then we would have gotten the job done, I feel.

8 Q. So I'm going to ask you a few questions about what
9 you just said. Do you have any ---? Can you give me
10 any number in terms of how many doors you knocked on
11 for Ted Cruz?

12 A. I cannot.

13 Q. Okay. Can you give me any number as to a
14 percentage of those doors where people just weren't
15 home? Because you just mentioned that happened.

16 A. I do not know.

17 Q. Were there more people not home or more people
18 that you interacted with that you couldn't get
19 signatures?

20 A. There was about half and half.

21 Q. Okay. So for the half who you interacted
22 with ---?

23 A. We had to work around Amy's available hours as
24 well.

25 Q. Okay. I'll get to that. Don't worry. I'll give

1 you every chance to talk about every horror story you
2 want, don't worry. And if I don't ask you, I'm sure
3 Mr. Rossi will. So just focus on my question. Okay?

4 A. Uh-huh (yes).

5 Q. So for the half that you interacted with, did I
6 understand you correctly that you were the primary
7 speaker?

8 A. It was myself, and my friend, Brian, was working
9 with me. We would take turns on the houses.

10 Q. Okay. And you recruited Brian, if I recall?

11 A. Yeah. He was another insurance agent that worked
12 with me at Consumer United, Goji.

13 Q. Okay. And you recruited him to be a signature
14 collector?

15 A. Yeah.

16 Q. And you've used him in other states?

17 A. Yeah. We've worked together for a while.

18 Q. And you're certainly comfortable going up to
19 somebody's door and knocking and asking them to sign a
20 signature?

21 A. Oh, certainly.

22 Q. And you've done that a number of times? Yes?

23 A. Yes.

24 Q. And you know the background, whether it's a
25 candidate or a question, how to try to pitch them so

1 they'll sign; correct?

2 A. Correct.

3 Q. Okay.

4 A. I mean, you know, campaigns are much more
5 difficult. You know, people don't want to sign. And
6 obviously it's going to be much more difficult, you
7 know, to get a candidate that people do not like or not
8 have heard of than someone who they already support,
9 obviously.

10 Q. Uh-huh (yes). Meaning if somebody's a Trump
11 supporter and you go to them, they're not going to sign
12 for Cruz?

13 A. Right. You have to really just try to close them
14 and to sell them into signing for Cruz anyway. Anybody
15 should be able to be on the ballot.

16 Q. Okay. And ---.

17 A. But, you know, I would get to the door with Amy
18 and they'd say, oh, I'm a Trump supporter, goodbye.
19 And it made it much more difficult, where, you know,
20 the person was slamming the door in their face, you
21 know, or closing the door. Where as if it was just me
22 working, I might have been able to sell them on the
23 idea of allowing another guy to be on the ballot. But,
24 you know, Amy sure didn't help me at all.

25 Q. Did Amy ever give the initial presentation when

1 you knocked at a door or was it you or Brian?

2 A. It was me or Brian.

3 Q. Did you go to any public places to try to get
4 signatures in Pennsylvania this time around or did you
5 just do door to door?

6 A. We didn't do any public places for Ted Cruz, but
7 we did for Rocky, ---

8 Q. Okay.

9 A. ---in subway tunnels and such.

10 Q. And you were more successful for Rocky, it sounds
11 like?

12 A. There's a big ---. You know, there's a lot more
13 Democrats in the city than there are Republicans.

14 Q. And in the Congressional District 8, is that a
15 Republican District or a Democratic District?

16 A. More Republican, from how I understand it.

17 Q. And that was the district that Mr. Pool assigned
18 you to?

19 A. Yeah.

20 Q. Do you have any information as to why he assigned
21 you there and, for example, not a district out here in
22 the mid-state somewhere?

23 A. You're going to have to ---

24 Q. Oh, I will ask him.

25 A. --- ask him that question.

1 Q. I will.

2 A. I do not recall.

3 Q. Okay. Fair enough. When you travel to all these
4 locations, let's just take 2016, do you fly to them
5 when you're collecting? Do you drive? Do you rent a
6 car? How do you get back and forth?

7 A. I usually use my own transportation. In this case
8 I used my own transportation and I rented a car.

9 Q. Okay. So when you went to all those states that
10 you talked about in this election cycle, 2016, you
11 would either drive your own car or you'd rent a car to
12 drive to that place?

13 A. Most of the time I was using my own vehicle.

14 Q. Okay. No flying?

15 A. No. I didn't take any flights this year.

16 Q. And when you're in these various states collecting
17 signatures or managing signature drives, things like
18 that, ---

19 A. Uh-huh (yes).

20 Q. --- are you staying in hotels, I'm assuming?

21 A. When I'm away from home, yes.

22 Q. So even when you're up in New Hampshire doing
23 work, if you were staying away from home and not
24 commuting every day, you were staying in a hotel in New
25 Hampshire?

1 A. Yeah. I sometimes tried to befriend people and,
2 you know, crash at their houses, if I can.

3 Q. Okay.

4 A. But I prefer to stay ---. Unless if I really know
5 the person very well, I'll prefer to stay at a hotel.

6 Q. Okay.

7 A. Or if I'm, you know, short on money, you know,
8 I'll stay at the hotel --- or the campaign will put me
9 up in a hotel or, you know. In Oregon I was introduced
10 to a roommate and I lived up there with him for a few
11 months.

12 Q. Okay.

13 A. But generally speaking when I'm traveling I'm
14 either --- you know, I'm staying in hotels for the most
15 part. It's the very expense of doing this type of
16 business, living on the road.

17 Q. Okay. Your work with Alex, has his business ever
18 collected signatures in the Commonwealth of
19 Pennsylvania, that you're aware of?

20 A. No, I don't think so.

21 Q. So your work in Pennsylvania has only been through
22 Benezet?

23 A. And Andy Jacobs.

24 Q. And Andy Jacobs. Sorry, I forgot about him.

25 Thank you.

1 A. Yeah. Other than those two people, I've not
2 worked in Pennsylvania.

3 Q. Okay. Were you part of any signature collection
4 efforts for a ballot question that's going on --- out
5 now? It's going on at Pittsburgh this year, for
6 OpenPittsburgh?

7 A. No.

8 ATTORNEY JOEL:

9 Can we take two minutes? I'm think I'm
10 just about done.

11 SHORT BREAK TAKEN

12 ATTORNEY JOEL:

13 I believe I'm done, pending any follow-up
14 to you.

15 EXAMINATION

16 BY ATTORNEY ROSSI:

17 Q. Mr. Alexander, beyond Andy Jacobs, do you know
18 anybody in Pennsylvania well enough to ask them to be a
19 witness?

20 A. No.

21 Q. Okay.

22 A. Actually, I do. I have a friend who lives like 45
23 miles --- 45 minutes east of Harrisburg. Actually I
24 did try to recruit her and her friends, and asked her
25 if she had any friends that could witness for us. And

1 she was not registered to vote nor did she express any
2 interest in registering to vote. I told her that we
3 could pay her, the money was lucrative and she still
4 didn't have any time for us.

5 Q. Okay.

6 A. She was busy with her own career.

7 Q. Sure. When you arrived in Pennsylvania ---?
8 Let's take the Cruz campaign signatures first.

9 A. Uh-huh (yes).

10 Q. Am I correct that the 8th District of Pennsylvania
11 is the western district of Pennsylvania?

12 A. What's that?

13 Q. Am I correct that the 8th District of Pennsylvania
14 is in the western district of Pennsylvania?

15 A. No. It's in the eastern part of Pennsylvania.

16 Q. Oh, I'm sorry.

17 A. Yeah.

18 Q. Okay.

19 A. We stayed in Willistown I believe it was.

20 Q. Oh, okay.

21 A. Yeah. New Hope, PA. Yeah, it was right around
22 the area we were at. We stayed for a few days.

23 Q. So you were in the eastern part of the state,
24 then, for the entire time in Pennsylvania?

25 A. Uh-huh (yes).

1 Q. Okay.

2 A. Honestly I don't remember the district number off
3 the top of my head.

4 Q. Well, you testified you were circulating for Cruz
5 in the 8th Congressional District in ---.

6 A. It was in ---. I do not know which --- what the
7 numbered district was. It was the same district as
8 Feasterville.

9 Q. Okay. Well you testified today, am I not correct,
10 that Ted Cruz was the 8th Congressional District?

11 A. Was it? I do not ---. Can you show me a district
12 map?

13 Q. No. I don't have a district map. I was going off
14 your testimony.

15 A. I believe it was the 8th. I'm not sure.

16 Q. Okay. Yeah. You testified New Hope, District 8,
17 for Cruz.

18 A. Okay. Yes, that is the eastern part of the state.

19 Q. All right. So you didn't have any witnesses? You
20 didn't have any personal contacts to actually ask
21 somebody to witness with you?

22 A. No.

23 Q. At any time while you were in Pennsylvania, were
24 you not --- was there any period of time you were not
25 able to circulate petitions for lack of a witness?

1 A. During the off hours of our witnesses. Our
2 witnesses had other things that they had to do. Amy,
3 she had --- I forget what it was. But, yes, I had to
4 go around the personal schedules of the witnesses that
5 we worked with and their abilities.

6 Q. When you do have a witness, ---

7 A. Yes.

8 Q. --- what is the process of hooking up with them,
9 for lack of better terminology?

10 A. Call them up and say, hey, we're going to be here
11 at such and such time.

12 Q. Are they always there on time?

13 A. For the most part.

14 Q. Okay. But there are situations where they are not
15 there on time, you have to wait for them?

16 A. I'm trying to remember. I do not recall.

17 Q. Do you personally know of any people who are
18 authorized to do notaries in Pennsylvania? Do you know
19 of anyone personally?

20 A. I have no personal contacts with notaries.

21 Q. How do you find a notary public in Pennsylvania?
22 When you got your signatures and you're ready to have
23 them notarized, how do you go about finding a notary?

24 A. Most banks have notaries. I have a Citizen's Bank
25 account in Pennsylvania --- well, out of Massachusetts

1 but they are in Pennsylvania. Only a small handful of
2 them actually have notaries. So I'd, you know, call up
3 the banks and see if they could, you know, access a
4 notary.

5 Q. Okay.

6 A. Well, some of them when we brought a larger amount
7 of signatures and stuff --- they could only notarize
8 bank documents. Some of the banks have their own
9 policies about the notarization of the signatures
10 versus bank documents.

11 Q. When you actually do find a notary and you
12 notarize the petitions, who pays for the notary fee?

13 A. I would assume Benezet ---

14 Q. Okay.

15 A. --- or the candidate.

16 Q. But at the point of sale, do you ---?

17 A. Yeah, I would have to pay for it.

18 Q. And then you get reimbursed for the notaries?

19 A. Correct.

20 Q. So when you --- in Pennsylvania you can't execute
21 the affidavit; correct?

22 A. No.

23 Q. Okay.

24 A. No, it has to be ---.

25 Q. Who is the person that executes the affidavit?

1 A. The witness.

2 Q. And the witness has to be available to go to the
3 notary? In addition to his or her normal tasks of
4 witnessing the petitions, ---

5 A. Uh-huh (yes).

6 Q. --- they have to then also go with you to the
7 notary that you find who is open and available?

8 A. Correct.

9 Q. Okay. So once the notaries ---? Once you no
10 longer have a notary available for that day, what do
11 you do? Are you able to go out and get more signatures
12 or ---?

13 A. No.

14 Q. Is there a situation ---? Have you ever had a
15 situation where you want out and got signatures after
16 the closing hours for notaries and were not able to
17 notarize them on the subsequent day?

18 A. When we did the ---. Yeah. With Amy we had to
19 wait until the next day to notarize the signatures.
20 With Kemitt we held all the signatures until the end.

21 Q. Kemitt. Who is Kemitt?

22 A. The witness in Philadelphia.

23 Q. Okay. And Kemitt is the one that ---. So let's
24 go down to the --- Kemitt witnessed for you in
25 Philadelphia for ---

1 A. Uh-huh (yes).

2 Q. --- Rocky De La Fuente?

3 A. Correct.

4 Q. And did you say he was 70 years old?

5 A. Yes.

6 Q. And you were essentially getting signatures for
7 Rocky in subway tunnels?

8 A. For the majority of the signatures, yeah.

9 Q. Is that because of the inclement weather?

10 A. Yes. It was very cool that weekend.

11 Q. Yeah. I believe it probably was.

12 A. It was extremely cold.

13 Q. So most people would be using the subway tunnels,
14 so that's where ---?

15 A. There was a mall underneath ---

16 Q. Yeah.

17 A. --- the city center.

18 Q. Yeah. And Kemitt would sit and just watch?

19 A. Yes, he would sit and watch, while Brian and I
20 stood and collected the signatures. He would watch the
21 both of us.

22 Q. Were you able to move around in that situation?

23 A. No, not really. You had to be within ---. You
24 know, to satisfy the witness requirement, I mean, we
25 couldn't walk away from Kemitt. If he went to --- you

1 know, say go to the bathroom or something, you know, I
2 couldn't bring my petitions with me and petition, not
3 without Kemitt, the witness.

4 Q. So were there situations where he had to go to the
5 bathroom and you had to stop petitioning?

6 A. Absolutely.

7 Q. Okay.

8 A. Many times. He was an old man.

9 Q. Right. So are there situations where you like to
10 be mobile and go with the crowd and ---?

11 A. Absolutely. Absolutely. And Kemitt stopped my
12 ability to do that.

13 Q. Okay.

14 A. There were many situations, you know ---. One day
15 we got one of our biggest days where we got lots of
16 signatures. We petitioned for about 11 hours and we
17 got hundreds of signatures that day. And the next day
18 Kemitt couldn't --- you know, he couldn't stand up all
19 day. You know, he's an old guy. He had to take a lot
20 of breaks and sit down. And, you know ---. Right.

21 Q. Okay. Do you know people in the Philadelphia area
22 that would be willing to be witnesses if you reached
23 out?

24 A. No, not at all.

25 Q. Okay.

1 A. We tried.

2 Q. Rocky didn't have any formal campaign structure in
3 Pennsylvania, did he?

4 A. No.

5 Q. Was there an office that you could call, you
6 know, ---

7 A. No.

8 Q. --- in Philadelphia?

9 A. No.

10 Q. Did Cruz have an office in Pennsylvania that you
11 could call, that you were aware of?

12 A. Not that I was aware of, no.

13 Q. Now this Kemitt guy, your witness in
14 Philadelphia, ---

15 A. Uh-huh (yes).

16 Q. --- you testified that when it came time to
17 notarize, he initially refused?

18 A. Yeah.

19 Q. And how was that issue resolved?

20 BRIEF INTERRUPTION

21 ATTORNEY JOEL:

22 Sorry. Can we go off the record? It's
23 the next witness. I should take his call. Forgive me.
24 OFF RECORD DISCUSSION

1 ATTORNEY ROSSI:

2 Could you read back my last question? I
3 apologize. Are you able to do that? I just want to
4 get my train of thought.

5 COURT REPORTER READS BACK LAST QUESTION

6 BY ATTORNEY ROSSI:

7 Q. When Kemitt initially refused ---. And he said
8 that directly to you?

9 A. Yeah. He said it. He said it directly to me and
10 Brian. You know, we're trying to get him to sign the
11 notarized --- to go to the notary and he would not. He
12 would not. You know, he requested ---. You know, his
13 version of how much money he was owed greatly differed
14 from what our tabulations were of what he worked and
15 what --- you know, the hours that we reported.

16 Q. That situation was resolved, not by you but by
17 others?

18 A. By Trent.

19 Q. Okay. So ---

20 A. Yeah.

21 Q. --- are you aware of what the resolution was?

22 A. Not entirely.

23 Q. So Kemitt did report to you that, I got my money
24 or ---?

25 A. No. I was talking to Kemitt on the phone. We

1 were going to meet him to pick him up to go take him to
2 the notary to go get the signatures notarized. And
3 that's when he was like, I'm not going to go get the
4 petitions notarized unless, you know, I have more
5 money, unless like, you know, what I ---. He felt that
6 he was owed a lot more money than what was previously
7 agreed on.

8 Q. Did he explain to you ---? Did he tell you why he
9 thought he was owed more money?

10 A. No. I don't recall. No. He just kind of held us
11 over a barrel.

12 Q. Okay.

13 A. You know, he refused to get it notarized without
14 more money.

15 Q. Now when you say work with Brian Lyra ---?

16 A. Lyra (corrects pronunciation).

17 Q. Lyra (changes pronunciation), sorry. You're not
18 working --- you're not like going door to door with
19 him, you're working --- one goes --- you're
20 alternating ---?

21 A. Well, we ---.

22 Q. Well, let me ask you this. What is the process
23 when you're working with somebody who isn't a witness
24 and then just another professional circulator?

25 A. Well, since we have to work with the witness, we

1 would split up. And we only had ---.

2 Q. Well, let's go outside Pennsylvania. Did you ever
3 work with somebody, ---

4 A. Yeah.

5 Q. --- another professional circulator, ---

6 A. Uh-huh (yes).

7 Q. --- outside of Pennsylvania?

8 A. Oh, absolutely.

9 Q. And do you ---? How do you work that? Do you
10 just ---?

11 A. Well, in, for example, Massachusetts we'll work
12 together and we'll go out in front of a grocery store.
13 He'll work one door, I'll work the other door. And
14 we'll ---.

15 Q. So you expand the geography, ---

16 A. Yeah.

17 Q. --- working with a friend?

18 A. Yeah. We're able to, you know, go and work at
19 different satellite locations or, you know, both him
20 and I will just, you know, walk around with a clipboard
21 and just, you know, walk up to random strangers. And,
22 you know, we're very effective.

23 Q. And in that circumstances you don't have to stay
24 in eye contact with the party you're working with?

25 A. No. Nope.

1 Q. So you can go half a mile away, you can roam?

2 A. Yeah. Sometimes we use walkie-talkies.

3 Q. Oh, do you really?

4 A. Yeah.

5 Q. I didn't know they still had those. All right.
6 Fair enough.

7 A. Well, we use them for, you know, skiing. So, you
8 know, they're very handy in the professional field as
9 well.

10 Q. Okay. All right. Now are there situations where
11 voters want to sign more than one paper?

12 A. Oh, absolutely. Yeah, there is.

13 Q. How does that come about? Like if somebody's
14 committed to a candidate, why would they sign --- why
15 would they ---?

16 A. Well, because competition ---.

17 ATTORNEY JOEL:

18 Objection. I'd just object to the form.
19 I don't know how he could know what somebody's
20 intention is in signing.

21 ATTORNEY ROSSI:

22 That's a valid objection. It's okay.

23 BY ATTORNEY ROSSI:

24 Q. In your experience people were willing to sign
25 more than one election candidate?

1 A. I've petition for multiple candidates before and
2 they've signed different candidates.

3 Q. So is it the normal practice outside Pennsylvania,
4 in your experience, to circulate more than one petition
5 at a time?

6 A. Yeah. I mean, we worked in Alabama in 2012. We
7 were petitioning for Johnson, Stein and Goode.

8 Q. Uh-huh (yes).

9 A. And, you know, most people signed all three,
10 because they thought that ---. Most of the people that
11 signed the petition had expressed that they felt that
12 we needed to have more choices.

13 Q. Have you worked for ---? In Pennsylvania, in
14 2016, have you worked for any of the minor party
15 candidates in Pennsylvania in the 2016 election cycle?

16 A. Rocky ran as a Democrat when I helped him get on
17 the ballot in Pennsylvania and Cruz was a Republican.

18 Q. So you did not circulate nominating papers in
19 Pennsylvania this election cycle? Let me clarify,
20 nomination, nominee petitions are for Republicans and
21 Democrats running ---

22 A. Okay.

23 Q. --- in the spring. Nominating papers are for
24 everyone else to get on the general election ballot.

25 A. Like Gary Johnson from ---.

1 Q. Right. Did you circulate any nominating papers
2 in ---?

3 A. No.

4 Q. When you were circulating petitions in 2016 in
5 Pennsylvania, for either Cruz or Rocky, did any voters
6 ask to --- to sign for more than one candidate?

7 A. Yeah. A lot of the people wanted to sign
8 petitions for Bernie and Clinton.

9 Q. Okay.

10 A. They said, why do you only have Rocky? I said,
11 well, I think anyone deserves to be on the ballot.
12 This is America.

13 Q. Yeah. Going to the 2012 Ron Paul campaign, you
14 said you actually ---. Back to 2012.

15 A. Correct.

16 Q. Okay. You circulated nominating petitions for Ron
17 Paul in Pennsylvania?

18 A. Uh-huh (yes).

19 Q. Okay. Correct?

20 A. Correct.

21 Q. And your witnesses were the delegates themselves?

22 A. Yes.

23 Q. Okay. Did you find the delegates motivated to
24 help out in getting signatures?

25 A. Yeah.

1 Q. Did they cause any problems in that circumstance?

2 A. No.

3 Q. Okay.

4 A. It was a very different experience in 2012.

5 Q. Now, you said --- you mentioned that you know one
6 in Pennsylvania other than Andy Jacobs?

7 A. Uh-huh (yes).

8 Q. That you know of a man by the name of Darrell
9 Bonner?

10 A. Yes.

11 Q. And he is a resident of Pennsylvania, is he?

12 A. I believe so.

13 Q. What experience have you had with his efforts?

14 A. Shoddy workmanship. I've seen him on various
15 occasions hire --- you know, have people circulate
16 petitions who produced less than genuine work, bad
17 validity. I've heard he's got very bad validity
18 before. I wouldn't want to work with him because of
19 that.

20 Q. In your experience has your validity rate been
21 pretty high?

22 A. Yeah. Very high.

23 Q. What's considered a high validity rate in this
24 state?

25 A. About 80, 90 percent.

1 Q. Ninety (90) percent?

2 A. Yeah. On some cases. I mean, you know, it
3 depends on if you work --- if you collect signatures
4 inside the Post Office or, you know, where voters tend
5 to go. We tend to have better signature validation
6 rates than say just the subway or, you know, just a
7 large crowd, you know, or an event or something.

8 Q. All right.

9 A. Or the DMV is also a great place to petition. A
10 lot of people register to vote after they get their
11 cars registered or whatever.

12 Q. Is it your experience that you're able to get more
13 signatures in states without a witness requirement ---

14 A. Absolutely.

15 Q. --- in Pennsylvania?

16 A. Well, I have the freedom to work whenever I want.

17 Q. Okay. And how late do you usually work?

18 A. I have worked as late as 4:00 in the morning?

19 Q. How do you do that?

20 A. There was one case where we were petitioning for
21 marijuana legalization. And I set up a table outside
22 of a liquor store in Boston, and a very busy corner in
23 Boston. There's a lot of club scene around there and
24 they were out there late in the morning. And, you
25 know, they signed in droves.

1 Q. Okay. That was good. That's very clever.

2 A. Well, you know, I mean, that's the market. That's
3 what you've got to do. The name of the game is to get
4 the signatures, to get whatever it is you're trying to
5 get on the ballot. And I'll, you know, do whatever is
6 necessary. They pay me to get the job done and that's
7 what I do.

8 Q. Now, Mr. Joel touched on training. You see
9 yourself as a professional?

10 A. Yeah.

11 Q. Based on your experience, you're able to ---. Is
12 there an art in getting a signature?

13 A. Yeah, it's just like selling.

14 Q. Okay.

15 A. It's just like, you know, the art of the sale;
16 right?

17 Q. And how did you learn how to do that? Just, I
18 mean ---.

19 A. You know ---.

20 Q. Instinct?

21 A. Yeah, I guess. I don't know. I've just been very
22 passionate about political things, and, you know, aware
23 of the news and such. And, you know, always had a deep
24 passion for, you know, liberty. And so, you know, I
25 find it very easy to talk on matters of liberty.

1 Q. Okay. But over time you ---?

2 A. Oh, well, yeah.

3 Q. Over time do you feel that you've gotten better at
4 this?

5 A. Oh, a lot. Hell, you sharpen your skills, you
6 know? After, you know, you go around the circuit a
7 little bit you find out what works and what doesn't.
8 And, you know, you're getting paid by the signature,
9 you want to do the most --- work the most efficient way
10 possible.

11 Q. Is there an impact ---? How are witnesses paid in
12 Pennsylvania? Let's go back to Pennsylvania. Based on
13 your knowledge, how are witnesses paid for their job?

14 A. By the hour.

15 Q. So they don't get any more money for you
16 collecting lots more signatures?

17 A. Nope.

18 Q. Do they show an interest in helping you get
19 signatures?

20 A. Not really.

21 Q. Okay.

22 A. I mean, you know, it's just ---. Well, Ms.
23 Strauss, she did not. She wasn't very motivated at
24 all. I would say Kemitt was a little bit more
25 motivated than Amy, but ---.

1 Q. How so?

2 A. Kemitt didn't immediately turn away if somebody,
3 --- you know, the least sign of no. But it was more of
4 in a public place, you know, where we petitioned where
5 there was a lot more people around, rather than just
6 going around door to door.

7 Q. Did Kemitt actively talk to voters to get them to
8 sign for you? You said he sat down?

9 A. Yeah. For the most part he ---

10 Q. Okay.

11 A. --- it was Brian and I doing all the work.

12 Q. So he didn't --- he didn't funnel people to
13 you ---

14 A. Not at all.

15 Q. --- like in sort of an airport landing people ---

16 A. No, no.

17 Q. --- people running into you?

18 A. No, not at all.

19 Q. Do any witnesses do that, act in that capacity?

20 A. No.

21 Q. They just stand there and watch; is that correct?

22 A. Correct.

23 Q. Okay. In a best case scenario?

24 A. In a best case scenario. You know, I mean, they
25 should be helping me get tons of signatures, you know?

1 Some extra help getting the required signatures would
2 have been great.

3 Q. But in your experience that does not happen?

4 ATTORNEY JOEL:

5 Objection.

6 ATTORNEY ROSSI:

7 Well, I'm asking for his experience.

8 BY ATTORNEY ROSSI:

9 Q. In your experience does that happen?

10 ATTORNEY JOEL:

11 Same objection.

12 ATTORNEY ROSSI:

13 You can answer the question.

14 A. Hardly ever.

15 BY ATTORNEY ROSSI:

16 Q. And going back to that e-mail about the big
17 payday, what did you consider a big payday at that
18 time?

19 A. Yeah. I've done a lot better since then. I
20 remember one day in Pennsylvania I made \$300. That was
21 my best day. I got a hundred signatures that day at \$3
22 a signature. It was tough, it was in winter.

23 Q. Yeah.

24 A. I've since honed my technique a lot more since
25 then.

1 Q. Did Cruz get on the ballot, to your knowledge?
2 Did Cruz make it onto the ballot in the 8th
3 Congressional District?

4 A. Not in the district that I got pulled out of, no.
5 That was the District that he was in, in Feasterville
6 and Doylestown.

7 Q. Okay. All right. Do you know ---? With respect
8 to the Cruz petition, you don't know what validity rate
9 you had?

10 A. I have no clue.

11 Q. To your knowledge, did they even bother to file
12 those petitions?

13 A. I don't think so. I don't know.

14 ATTORNEY ROSSI:

15 Okay. I'm done. Thank you.

16 ATTORNEY JOEL:

17 Yeah.

18 RE-EXAMINATION

19 BY ATTORNEY JOEL:

20 Q. Yeah. Are you aware that there's some 80,000
21 notaries in the Commonwealth of Pennsylvania?

22 A. No.

23 Q. Okay. You said that you had a very different
24 experience in 2012 as opposed to 2016 in Pennsylvania?

25 A. Uh-huh (yes).

1 Q. Yes?

2 A. Yes.

3 Q. Okay.

4 A. With the witnesses, anyway.

5 Q. Right. And your ability to get signatures and get
6 them notarized and get them filed, all that stuff?

7 A. Well, in 2012 we were petitioning for the
8 delegates to be on the ballot to go to the Republican
9 National Convention and they were very motivated to go
10 to the convention.

11 Q. Okay. And those were the delegates for ---

12 A. Ron Paul.

13 Q. --- Ron Paul?

14 A. Uh-huh (yes).

15 Q. And that was work that you got through Andy
16 Jacobs?

17 A. Correct.

18 Q. And that was a better experience. You got more
19 signatures, you didn't have the issues ---?

20 A. It was a better experience because the witnesses
21 were more motivated ---

22 Q. Okay.

23 A. --- to do the job. And it was the first time
24 where I'd been on the road where I got my expenses
25 compensated. So I, you know, recall that being very

1 positive. And, you know, I had more money in my bank
2 account at the end of that drive, because I hadn't had
3 to spend it on hotels and such.

4 Q. And getting back to where I was going, it was a
5 better experience, you got more signatures; correct?

6 A. I don't know.

7 Q. Okay. But that was a better experience in terms
8 of gathering signatures than it was this year; correct?
9 Is that what I understood you to mean?

10 A. Yeah.

11 Q. And in 2012 you worked through Andy Jacobs ---

12 A. Yes.

13 Q. --- to get that work. And this time around you
14 worked through Benezet?

15 A. Correct.

16 Q. Okay. Now, you mentioned the person who was
17 witnessing you for Mr. De La Fuente. I think you used
18 at one point the word extortion. Did you call the cops
19 on him?

20 A. No.

21 Q. Did you call the DA ---

22 A. No.

23 Q. --- to have him arrested for extortion, anything
24 like that?

25 A. No.

1 Q. Did you call the Office of Attorney General?

2 A. No.

3 Q. Okay.

4 A. I mean, other than this proceeding here.

5 Q. Right. But you didn't ---? When Kemitt --- is
6 that his name?

7 A. Yes.

8 Q. When, according to you he extorted you, you didn't
9 report him to the police?

10 A. He extorted the campaign. I think it was between
11 Trent and Mr. Kemitt (sic).

12 Q. Okay. The deal to engage Mr. Kemitt (sic) to be a
13 witness, that was between him and Benezet?

14 A. Correct.

15 Q. So you don't know what the particulars were of
16 their deal, how much he was supposed to be paid per
17 hour, per signature, per day, anything like that?

18 A. Correct.

19 Q. That was a deal between Benezet and Mr. Wilson?

20 A. Correct.

21 Q. And was he being paid directly by Benezet?

22 A. I do not know the details.

23 Q. You weren't going to front him the money?

24 A. What's that?

25 Q. You weren't fronting him the money?

1 A. I was not.

2 Q. Okay.

3 A. It wasn't my money, no.

4 Q. Now, you said something about that there was a
5 disagreement as to the version of what he thought he
6 should have been paid versus the hours that you had
7 been working? That was about what you said. So I'm
8 curious what the dispute was, if you know? What his
9 position was, what Benezet's position was.

10 A. Kemitt said that ---. Like we had gone over to
11 his house and had some coffee with him. And we drove
12 to the different areas of petition. That took time.
13 He claimed that he should be compensated for the hours
14 that we spent with him at his house drinking coffee
15 and, you know, getting to know him.

16 Q. Okay. So that was his position and ---?

17 A. And our position was that he should be paid for
18 the work that we did.

19 Q. So the time actually in the subway platform, for
20 example?

21 A. Correct.

22 Q. And you don't know what the contract was between
23 Benezet and Mr. Wilson?

24 A. I do not.

25 Q. Okay. Oh, you said that Mr. Wilson and I'm

1 assuming the woman who helped you on Cruz, it's your
2 understanding they were --- Strauss, that they were
3 being paid by hour --- hourly?

4 A. Yes.

5 Q. Do you know that for a fact or is that just your
6 supposition?

7 A. I believe that's that what ---. Yeah. Because
8 Trent asked me to let him know how many hours they
9 worked.

10 Q. Okay.

11 A. So I would assume that's how they were getting
12 paid.

13 Q. But that deal between the witness and Benezet, for
14 whatever they were going to get paid for witnessing,
15 was between the witness and Benezet?

16 A. Correct. It wasn't until the last day that Kemitt
17 decided that, you know, he wasn't going to go to the
18 notary.

19 Q. Okay.

20 A. You know, and from how I understand it, he
21 demanded an extra \$500.

22 Q. And he took that up with Mr. Pool, I'm assuming?

23 Q. Yes.

24 Q. And they resolved it somehow?

25 A. Yes.

1 Q. Because he did sign your petitions?

2 A. He did.

3 Q. And he did sign it before a notary?

4 A. He did.

5 Q. Okay. And the agreement that was struck on how
6 they were to be paid and the basis for that payment was
7 a deal between Benezet and those individuals?

8 A. Yes, I would assume so.

9 ATTORNEY JOEL:

10 That's all I have. Oh, you know, I'm
11 sorry.

12 ATTORNEY ROSSI:

13 No, you said that's all you had.

14 BY ATTORNEY JOEL:

15 Q. Is it your understanding that Senator Cruz did
16 make the ballot for the Republican Primary?

17 A. I don't think he made it on the ballot in the
18 district that I was assigned to.

19 Q. That wasn't my question. Did he make it on the
20 ballot in the Republican Primary for the Commonwealth
21 of Pennsylvania?

22 A. I do not ---. I don't think it's ---. It was
23 Cruz plus his delegates in that district. So Cruz may
24 have made it on the ballot in Pennsylvania, but I don't
25 believe the delegates that we were petitioning for made

1 it on the ballot.

2 Q. How about Rocky, did he make it?

3 A. I believe he did. Yes, he did.

4 Q. Okay. And when you were petitioning in the
5 congressional 8th District, were you petitioning for
6 Cruz ---

7 A. Yes.

8 Q. --- or for his delegates?

9 A. Both.

10 Q. Both?

11 A. Yes.

12 Q. And did you have different success rates on Cruz
13 versus the delegates?

14 A. Yeah. Whichever petition was the first got the
15 most signatures. Like we had three different
16 petitions. So they would sign one petition and then
17 they'd flip the page and sign another petition, then
18 flip the page and sign another petition. But some
19 people said they didn't have the time to sign all the
20 petitions, so they only signed two of the three.

21 Q. Okay.

22 A. You know, so whoever was on top got more
23 signatures.

24 Q. Do you know if that was Senator Cruz?

25 A. I think it might have been one of the delegates,

1 actually.

2 ATTORNEY JOEL:

3 Okay. That's it. Thanks.

4 A. Thank you.

5 * * * * *

6 DEPOSITION CONCLUDED AT 1:00 P.M.

7 * * * * *

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1 COMMONWEALTH OF PENNSYLVANIA)

2 COUNTY OF BEDFORD)

3 CERTIFICATE

4 I, Bernadette M. Black, a Notary Public in
5 and for the Commonwealth of Pennsylvania, do hereby
6 certify:

7 That the foregoing proceedings, deposition of
8 Michael Alexander was reported by me on 9/26/16 and
9 that I, Bernadette M. Black, read this transcript, and
10 that I attest that this transcript is a true and
11 accurate record of the proceeding.

12 That the witness was first duly sworn to
13 testify to the truth, the whole truth, and nothing but
14 the truth and that the foregoing deposition was taken
15 at the time and place stated herein.

16 I further certify that I am not a relative,
17 employee or attorney of any of the parties, nor a
18 relative or employee of counsel, and that I am in no
19 way interested directly or indirectly in this action.

20
21 COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Bernadette M. Black, Notary Public

Everett Boro, Bedford County

My Commission Expires Jan. 17, 2017

22
23 MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Bernadette M. Black

24 Bernadette M. Black,

25 Court Reporter

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87:20,21	27:10 30:7	Willistown	woman 43:19	92:3,16,17
walked 24:24	31:2,8	77:19	102:1	94:9 95:11
walkie-t...	32:18	Wilson 25:12	won 36:19	98:15
88:2				

99:13	wrapping	76:1 77:17	0	66:12
101:18	15:8 16:21	77:21,21	02125 10:20	2012 11:16
worked 12:18	34:2	78:16	02556 12:11	31:23 32:2
12:25 14:9	write 8:11	80:17	1	32:2,5
14:15	48:12	81:18 82:8	15:6 48:2,4	47:22
15:23 18:2	written 30:2	82:11,16	48:9	48:16,20
18:2,4	wrong 14:11	82:18	1:00 105:6	49:9,19,22
19:11 28:3	26:16	84:18 85:9	1:16-CV-...	50:8 53:4
28:4 31:8	X	85:20 87:4	1:8	54:10 55:7
32:13	X 4:1	87:16,18	10th 15:10	56:25
33:25 34:6	Y	88:2,4,12	10,000 45:11	58:23
37:18 38:2	yeah 8:24	89:6 90:7	45:12 46:2	63:15,20
49:21,24	9:9 11:18	90:13,25	10:30 2:11	89:6 90:13
57:9,12	15:5,20,20	91:22 92:2	105 4:9	90:14 91:4
60:17 66:2	16:10,19	93:10,13	106 4:10	97:24 98:7
66:10,12	17:15 18:4	93:21 94:2	1099 20:8,10	99:11
67:3 71:11	18:9 20:1	95:9 96:19	11 83:16	2013 11:18
71:17 76:2	22:2 23:17	96:23	12/8 51:12	63:15,21
79:5 85:14	26:2 29:22	97:17,20	13 32:3	2014 63:23
89:6,13,14	32:2,3,4	99:10	13th 2:9	2015 11:23
92:18	32:19 33:2	102:7	15 52:10	30:3,4,14
99:11,14	33:2,10	104:14	65:1	31:24 54:7
102:9	34:3,6,12	year 13:9	15th 3:13	63:22,25
working	34:14,14	14:5 22:21	16 52:10	64:1,2,4,6
15:17	34:19,23	32:18	64:2 65:19	64:13 65:9
18:24 24:8	35:2,4,12	46:19	17120-0001	65:12,17
25:12 29:2	35:17 36:2	56:14,15	3:15	2016 1:18
29:4,11	37:7,18,25	57:2,7	17554 3:6	2:10 13:3
38:4,7	38:6 39:22	63:4,5	2	13:7 14:17
41:16 47:3	39:23	64:22	2 5:7 50:12	14:20 15:2
52:1 63:13	41:16 42:9	66:12	50:14,18	32:17
66:19	43:25	74:15 76:5	2000 10:23	46:16 50:8
67:18,24	44:12	99:8	2007 12:18	53:16
71:8 72:22	45:13	years 11:13	12:22	55:16
86:18,19	48:12	29:9,12	31:10,23	56:10,24
86:23	49:17 50:2	48:13	2008 12:21	64:21,24
87:17,24	51:12,24	62:24 63:1	12:22	65:8 74:4
101:7	52:1,9,20	63:18 82:4	2009 67:10	74:10
workmanship	53:6,14,17	Yep 15:3	2010 12:4	89:14,15
91:14	56:13,20	York 11:8	63:8,10,11	90:4 97:24
works 94:7	57:8,17,20	13:25	66:5,22,23	22 10:19
worry 70:25	58:6 60:15	\$	67:6	12:9
71:2	60:19 62:1	\$3 59:21	2011 32:3	26 1:18 2:10
worse 34:22	62:1 63:6	61:15	57:8,11,12	3
wouldn't	63:22	96:21	58:23 63:3	3 10:19
44:1 91:18	71:11,15	\$300 96:20	63:5,7,9	30 30:18
would've	71:17	\$5 40:19	63:14	316 3:5
57:10	73:19 75:1	\$500 102:21	65:24	360 68:10
wrapped		\$8 40:25		
44:24				

<u>4</u> 4:00 92:18 45 76:22, 23 48 5:6				
<u>5</u> 50 5:7 500 43:18				
<u>6</u> 6,000 60:25				
<u>7</u> 7 4:5 7th 16:22 17:1 7,000 45:13 45:15 7:00 36:11 70 82:4 70s 25:13, 18 76 4:5, 7				
<u>8</u> 8 14:10 18:12, 23 56:4 73:14 78:16 8th 11:18 16:23 17:1 63:21 77:10, 13 78:5, 10, 15 97:2 104:5 8,000 60:25 61:1 80 91:25 80,000 97:20 88 6:4				
<u>9</u> 9/26/16 106:8 90 91:25 92:1 96 6:4, 4 97 4:7, 9				

PA - tdonnpool@gmail.com - Gmail

6/11/16, 11:23 PM

the greatwaldoneous@gmail.com

Gmail

Move to Inbox

COMPOSE

PA

Inbox x

Inbox (8,355)

Starred

Important

Sent Mail

Drafts (335)

Circles

[Gmail]Trash

[Imap]/Drafts

Campaign - Supreme...

Deleted Messages

Letters to Writers

marakesh

Notes

Personal

Pittsburgh Business ...

Resume/Pedigree

Sent Messages (3)

Travel

More

 **Trenton Pool** <tdonnpool@gmail.com>

Feb 3

to Brian, Michael

Hey Guys-

Come to PA tomorrow am and get here immediately so I can get you guys to know for Ted Cruz and get it done in 5 or 6 days then work for Rocky. It will be big \$. \$ tomorrow hopefully.

 **Michael Alexander** <greatwaldoneous@gmail.com>

Feb 3

to me, Brian

Yeah, Carol and I rocked PA 4 years ago for Ron Paul, we made a bunch of cash blast in Philly. Let's do this thing!!!!

 **Trenton Pool** <tdonnpool@gmail.com>

Feb 3

to Michael, Brian

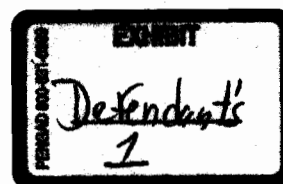
Come now

 **Michael Alexander** <greatwaldoneous@gmail.com>

Feb 3

to me, Brian

I'm packing. Brian needs to get over his sickness, get his car ready and pack. It's manageable 6 hour drive but we need to be ready



**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**BENEZET CONSULTING, LLC;
TRENTON POOL *and* CAROL LOVE**

PLAINTIFFS,

VS.

PEDRO A. CORTÉS, in his official capacity as the Secretary of the Commonwealth of Pennsylvania; and **JONATHAN MARKS**, in his official capacity as Commissioner, of the Bureau of Commissions, Elections and Legislation

DEFENDANTS.

CIVIL ACTION

No. 1:16-CV-00074

Hon. Yvette Kane

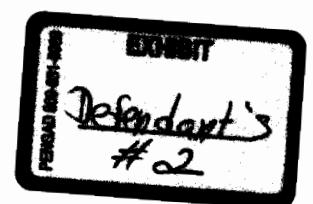
RECEIVED

SEP 14 2016

Office of Attorney General
Litigation Section

MICHAEL ALEXANDER'S PRODUCTION OF DOCUMENTS

Attached hereto is Michael Alexander's production of documents pursuant to defendants' "Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action" dated August 12, 2016. Based on information and after an examination by Michael Alexander of the documents in his possession, any category of documents not attached either do not, or no longer exist, or are not in the possession of Michael Alexander. Michael Alexander is aware of a continuing obligation to supplement this production of documents and



will continue to produce any requested document(s) that he becomes aware that is in his possession.

Respectfully submitted,

Dated: September 14, 2016



Paul A. Rossi, Esq.

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**BENEZET CONSULTING, LLC;
TRENTON POOL *and* CAROL LOVE**

PLAINTIFFS,

vs.

**PEDRO A. CORTÉS, in his official capacity
as the Secretary of the Commonwealth of
Pennsylvania; and JONATHAN MARKS,
in his official capacity as Commissioner,
of the Bureau of Commissions, Elections and
Legislation**

DEFENDANTS.

:
:
: **CIVIL ACTION**
:
: **No. 1:16-CV-00074**
: **Hon. Yvette Kane**
:
:
:
:
:
:
:
:

CERTIFICATE OF SERVICE

I, Paul A. Rossi, attorney for plaintiffs, hereby certify that on September 14, 2016, I personally served Michael Alexander's production of documents and the foregoing document on Nicole J. Radziewicz, Deputy Attorney General of the Commonwealth of Pennsylvania.

Dated: September 14, 2016



Paul A. Rossi, Esq.



INVOICE

2

Rocky/Cruz campaign PA
 Kicking Ass & Taking Names Inc
 Michael Alexander, Brian Lyra, Carolyn Glovsky

Date: Feb 17, 2016

Due Date: Feb 17, 2016

Balance Due: \$1,070⁵⁰

Benezet Consulting LLC

Item	Quantity	Rate	Amount
Kemitt Wilson Food Fund (\$16 paid by Brian, \$48 by Michael)	8	\$8	\$64
Amy Strauss Food Fund (Brian)	2	\$8	\$16
PPA Gateway Garage: entered 2/10 @ 11:39 exited 2/12 @ 14:04	1	\$56	\$56
PPA Gateway Garage entered 2/8 @ 21:05 exited 2/10 @ 16:47	1	\$25	\$25
PPA Gateway Garage: entered 2/8 @ 00:10 exited 2/8 @ 10:09	1	\$19	\$19
PPA Gateway Garage: entered 2/8 @ 21:28 exited 2/9 @ 8:56	1	\$5	\$5
PPA Gateway Garage: entered 2/8 @ 00:11 exited 2/8 @ 21:26	1	\$20	\$20
Street parking - 2/8 4:26pm - 7:26pm	1	\$7 ⁵⁰	\$7 ⁵⁰
Street parking - 2/8 2:27pm - 4:27pm	1	\$5	\$5
Street parking - 2/8 12:20pm - 12:20pm 2:20pm	1	\$5	\$5
Street parking - 2/9 2:23pm - 4:23pm	1	\$5	\$5
Street parking - 2/9 4:20pm - 6:20pm	1	\$5	\$5
Street parking - 2/9 6:32pm - 7:32pm	1	\$2 ⁵⁰	\$2 ⁵⁰
Street parking 2/11 10:01am - 11:13am	1	\$3	\$3
Street parking 2/11 5:32pm - 7:32pm	1	\$6	\$6
Street parking 2/11 7:50am - 10:00am	1	\$5	\$5
Street parking 2/12 7:54am- 10:00am	1	\$5	\$5
CVS: pens	1	\$3 ⁸³	\$3 ⁸³
Staples printing	1	\$23 ¹¹	\$23 ¹¹
Fedex store (scanning receipts)	1	\$10 ⁵²	\$10 ⁵²
Enterprise rent a car	1	\$287 ²⁴	\$287 ²⁴
Rodeway Inn & Suites (2/4 - 2/6)	1	\$184 ⁴³	\$184 ⁴³
Red Roof Inn 2/6 -2/7 (Brian)	1	\$78 ⁶⁴	\$78 ⁶⁴
Shell Doylestown 2/5 (Brian)	1	\$27 ²⁵	\$27 ²⁵

Item	Quantity	Rate	Amount
Shell Doylestown 2/5 (Kemitt)	1	\$10 ⁰⁸	\$10 ⁰⁸
Sunoco Feasterville (Brian)	1	\$6	\$6
Philly gas 2/6	1	\$5 ⁶⁶	\$5 ⁶⁶
Sunoco Trenton 2/7 (cheapest price I've seen in years, filled up both cars from empty)	1	\$45 ⁷⁹	\$45 ⁷⁹
APlus Walnut St Philla 2/12	1	\$3	\$3
APlus Woodhaven Road Philly 2/13 (caravan final fill before rental drop off)	1	\$30	\$30
APlus Woodhaven Road Philly 2/13 (subaru)	1	\$21 ⁰²	\$21 ⁰²
Sunoco Burlington 2/14	1	\$25 ⁰¹	\$25 ⁰¹
Raceway 2/15	1	\$19 ⁸⁵	\$19 ⁸⁵
NJ Turnpike	1	\$0 ⁹⁰	\$0 ⁹⁰
Port Authority NY Welcome to NY Bridge Tax 2/15	1	\$15	\$15
Mobil Lodge TPK I-395 2/16	1	\$19 ¹⁷	\$19 ¹⁷

Subtotal \$1,070⁵⁰

Total \$1,070⁵⁰

There was also \$15 in printing services we got at UPS store that I could not find the receipt for, as well as another \$15 trip to the dollar store to get boards, pens, clips, and other stationary supplies which I cannot find the receipt for. Also, from our food receipts it's difficult to know who ordered what and in some cases was split family style. Rest assured, these are accurate numbers and came 100% from own personal money savings.

Kemitt lunch fund = 8 days X \$8/day = \$64 (\$16 paid by Brian, \$48 by Michael)
Amy lunch fund = 2 days X \$8/day = \$16 (Brian)

Parking:

PPA Gateway Garage: 2/10 - \$56.00
PPA Gateway Garage: 2/8 - \$25.00
PPA Gateway Garage: 2/8 - \$19.00
PPA Gateway Garage: 2/8 - \$5.00
PPA Gateway Garage: 2/8: \$20.00
Street parking - 2/8 7:26pm \$7.50
Street parking - 2/8 4:27pm \$5.00
Street parking - 2/8 2:20pm \$5.00
Street parking - 2/9 4:23pm \$5.00
Street parking - 2/9 6:20pm \$5.00
Street parking - 2/9 7:32pm \$2.50
Street parking 2/11 11:13am \$3.00
Street parking 2/11 7:32pm \$6.00
Street parking 2/11 10:00am \$5.00
Street parking 2/12 10:00am \$5.00
Total parking: \$174

Stationary/printing:

CVS: pens - \$3.83
Staples printing: \$23.11
Fedex store (scanning receipts): \$10.52
Total: \$ 37.46

Hotel/rental car

Enterprise: \$287.24
Rodeway Inn & Suites (2/4 - 2/6)- \$184.43
Red Roof Inn 2/6 -2/7 - \$78.64 (Brian)
Total: \$ 550.31

Gas/tolls:

Shell Doylestown 2/5 - \$27.25 (Brian)
Shell Doylestown 2/5 - \$10.08
Sunoco Feasterville - \$6.00 (Brian)
Philly gas 2/6 - \$5.66
Sunoco Trenton 2/7 - \$45.79
APlus Walnut St Philla 2/12 - \$3.00
APlus Woodhaven Road Philly 2/13 \$30.00
APlus Woodhaven Road Philly 2/13 \$21.02
Sunoco Burlington 2/14 - \$25.01
Raceway 2/15 - \$19.85
Port Authority 2/15 - \$15
NJ Turnpike \$0.90

Mobil Lodge TPK I-395 2/16 - \$19.17

Total gas - \$ 222.73

Grand total: \$1059.98

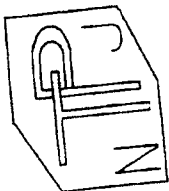


Outerbridge Crossing

Lane: 10
Card #: 30205
Date: 02/15/2016 20:12
Class: 1
Toll Paid: \$ 15.00

Get E-ZPass today
Save time & money
Visit www.joinEZpass.com

Thank You, Drive Safely



N.J. TURNPIKE

TOLL
ENTRY EXIT LANE CLASS
009 010 01 01 PD \$0.90

02/15/2016 20:03
Trans. No.: 077159
Collector ID: 022397

Thank You

LODGE TPK I-395 PLAINF
JOHN DAVIS LOD TPK I-3
MOOSUP. CT 06354

02/16/16 01:27:26

Pump #: 4 /Self
Product: Regular 81
Gallons 9.886
\$/Gal 1.939
Fuel Sale 19.17
Total Sale 19.17

Dealer #: 0000000009742
412
Merch #: FF09120990001

Shift #: 1
Credit Card #: 19.17
Discover 377

Auth Code: 01679R
Invoice #: 15331
STAN 15177
APPROVED 01679R

769401S3125C4

THANK YOU FOR CHOOSING MOBIL

WELCOME TO
HAWTHORNE
NEW JERSEY
02/14/16
7:28 PM

WELCOME TO
HAWTHORNE
NEW JERSEY
02/14/16
7:28 PM

WELCOME TO
HAWTHORNE
NEW JERSEY
02/14/16
7:28 PM

WELCOME TO
HAWTHORNE
NEW JERSEY
02/14/16
7:28 PM

WELCOME TO
HAWTHORNE
NEW JERSEY
02/14/16
7:28 PM

WELCOME TO
HAWTHORNE
NEW JERSEY
02/14/16
7:28 PM

WELCOME TO
HAWTHORNE
NEW JERSEY
02/14/16
7:28 PM

WELCOME TO
HAWTHORNE
NEW JERSEY
02/14/16
7:28 PM

APlus

0363-1371-05

4001 Woodhaven Road
Philadelphia Pennsylv

* FINAL RECEIPT *

For Credit Sales
Card Charged Only
Total Shown Below.

Trans #: 721709
Grade: Reg. (87) D
Pump Number: 04
Gallons: 11.188
Price: \$1.879
Total Fuel: \$21.02
Total Sale: \$21.02

Term: JD42419046001

Appr: 01395R

Seq#: 036791

Discover
Capture
XXXXXXXXXXXX3770

WELCOME

TO34423610-001
SUNOCO 0341233202
357 E FEDERAL STREET
BURLINGTON NJ 0801

DATE 02/14/16
TIME 7:28 PM
REF#

CARD#
ACCOUNT NUMBER
APPROVED

PUMP PRODUCT PPG
04 ULTR \$2.159

GALLONS TOTAL
11.582 \$25.01

INCL 0.080/G DISC

THANK YOU
HAVE A NICE DAY

Sunoco
110 Sanhioan Drive
Trenton New Jersey 0

2/7/2016 11:14:58 P
* FINAL RECEIPT-
For Credit Sales
Card Charged Only
Total Shown Below.
ID:

Trans #: 844560
Grade: Regular (87)
Pump Number: 10
Gallons: 28.634
Price: \$1.599
Total Fuel: \$45.79
Total Sale: \$45.79

Term: JB34418584001

Appr: 425304

Seq#: 038541

Visa
XXXXXXXXXXXXX5773

02/07/2016 23:0
Thank You F
Shopping Sur

WELCOME
SALES RECEIPT
57 543 402607

SHELL
216 S MAIN ST
DOYLESTOWN
PA 18901

DATE02/06/16 6:30PM
INVOICE# 111682
AUTH# 698749
VISA
ACCOUNT NUMBER
XXXX XXXX XXXX 5773 /
ALEXANDER

PUMP PRODUCT \$/G
01 REG \$1.999
GALLONS FUEL TOTAL
5.043 \$ 10.00

Choose our best
(most advanced)

Shell V-Power
NITRO+...the BEST
total engine
protection you can
get.

THANK YOU
COME BACK SOON

WELCOME
SALES RECEIPT
57 543 402607

SHELL
216 S MAIN ST
DOYLESTOWN
PA 18901

DATE02/06/16 5:01PM
INVOICE# 111675
AUTH# 160313
VISA
ACCOUNT NUMBER
XXXX XXXX XXXX 0389
LYRA/BRIAN

PUMP PRODUCT \$/G
06 UPOM \$2.659
GALLONS FUEL TOTAL
10.262 \$ 27.29

Choose our best
(most advanced)

Shell V-Power
NITRO+...the BEST
total engine
protection you can
get.

THANK YOU
COME BACK SOON

02/13/2016 08:51:01

Discover
Capture
XXXXXXXXXXXXX3770

Seq#: 036798

Appr: 013498

Term: JD42419046001

Trans #: 721744
Grade: Reg. (87) D
Pump Number: 02
Gallons: 15.966
Price: \$1.879
Total Fuel: \$30.00
Total Sale: \$30.00

APLUS
0363-1371-05
4001 Woodhaven Road
Philadelphia Pennsylv
* FINAL RECEIPT*
For Credit Sales
Card Charged Only
Total Shown Below.

APLUS
0363 2429-02

2201 Walnut Street
Philadelphia, Pennsylvania 19103
2/12/2016 6:34:33 PM
Transaction #: 2956708
Register #: 100

Pay at Pump Sale
Pump/Regular (8/)
1.613 gallons @ \$1.859/gal
Sub. Total: \$3.00
Tax: \$3.00
Total: \$0.00
Discount Total: \$3.00
Debit: \$0.00
Change \$0.00

Join Our Loyalty Program And Save

Term: 01/42655461001
2016, 17

DATE
EXPIRATION TIME

02/11/16 07:32PM

Fee Paid \$6.00

MACHINE: 91C103
DISPLAY ON
CURBSIDE DASH

Purchase Time: 05:32PM

DATE
EXPIRATION TIME

02/08/16 07:26PM

Fee Paid \$7.50

MACHINE: 12F044
DISPLAY ON
CURBSIDE DASH

Purchase Time: 04:26PM

DATE
EXPIRATION TIME

02/11/16 11:13AM

Fee Paid \$3.00

MACHINE: 53F016
DISPLAY ON
CURBSIDE DASH

Purchase Time: 10:01AM

DATE
EXPIRATION TIME

02/12/16 10:00AM

Fee Paid \$5.00

MACHINE: 53F015
DISPLAY ON
CURBSIDE DASH

Purchase Time: 07:54AM

DATE
EXPIRATION TIME

02/09/16 07:32PM

Fee Paid \$2.50

MACHINE: 53F018
DISPLAY ON
CURBSIDE DASH

Purchase Time: 06:32PM

DATE
EXPIRATION TIME

02/11/16 10:00AM

Fee Paid \$5.00

MACHINE: 53F016
DISPLAY ON
CURBSIDE DASH

Purchase Time: 07:50AM

PPA GATEWAY GARAGE
16TH & SPRING ST.

Pay Station Number:

Entered:

Exited:

Ticket Number:

Transaction Number:

Rate:

Parking Fee:

02/08/2016
10
21:0502/10/2016
16:47

28742

285734

A

\$ 25.00

Total Fee: \$ 25.00
Fee Paid: \$ 25.00

Visa

XXXXXXXXXXXX0005773

Approval Number: 358641

Thank you for your visit
Please come again !PPA GATEWAY GARAGE
16TH & SPRING ST.

Pay Station Number:

Entered:

Exited:

Ticket Number:

Transaction Number:

Rate:

Parking Fee:

02/08/2016
10
00:1002/08/2016
10:08

28427

283810

A

\$ 19.00


Total Fee: \$ 19.00
Fee Paid: \$ 19.00


Visa


XXXXXXXXXXXX0005773


Approval Number: 444651

Thank you for your visit
Please come again !


DATE 02/09/16 06:20PM
EXPIRATION TIME
Fee Paid \$5.00
MACHINE: 53F018
DISPLAY ON
CURBSIDE DASH
Purchase Time: 04:20PM


DATE 02/08/16 02:20PM
EXPIRATION TIME
Fee Paid \$5.00
MACHINE: 12F044
DISPLAY ON
CURBSIDE DASH
Purchase Time: 12:20PM


DATE 02/09/16 04:23PM
EXPIRATION TIME
Fee Paid \$5.00
MACHINE: 53F018
DISPLAY ON
CURBSIDE DASH
Purchase Time: 02:23PM


DATE 02/08/16 04:27PM
EXPIRATION TIME
Fee Paid \$5.00
MACHINE: 12F044
DISPLAY ON
CURBSIDE DASH
Purchase Time: 02:27PM

**Red Roof Inn Philadelphia - Oxford Valley**

3100 Cabot Boulevard West

Langhorne, PA 19047 US

Phone: 215-750-6200

Fax: 215-750-6205

Email: i0165@redroof.com

Printed: 2/7/2016 10:06:05 AM

Folio (Detailed)

Name: LYRA, BRIAN A

Confirmation Number: 165-994795

Address: 110 CONLYN AVE
FRANKLIN, MA 020380000 US

Room: 325

Room Type: ND2FM, NON-SMOKING DELUXE 2 FULL BEDS MICRO-

Nights: 1

Guests: 3/0

Rate Plan: RHD

Daily Rate: \$70.69 + \$6.36 Tax

GTD: 913 - VISA

Arrival: 2/6/2016 (Sat)

Departure: 2/7/2016 (Sun)

XXXX XXXX XXXX 0389

Room Rate:

2/6/2016 (Sat) - 2/6/2016 (Sat) \$70.69 + \$6.36 Tax per night.

Date	Code	Description	Amount	Balance
2/6/2016	100	ROOM CHARGES	\$70.69	\$70.69
2/6/2016	150	STATE TAX	\$4.24	\$74.93
2/6/2016	151	COUNTY TAX	\$2.12	\$77.05
2/6/2016	624	SAFE WITH LIMITED WARRANTY	\$1.50	\$78.55
2/6/2016	155	MISCELLANEOUS TAX	\$0.09	\$78.64
2/7/2016	913	VISA (0389)	(\$78.64)	\$0.00

Summary

Room	Tax	F&B	Other	CC	Cash	DB
\$70.69	\$6.45	\$0.00	\$1.50	(\$78.64)	\$0.00	\$0.00

**Rodeway Inn & Suites (PA668)**

6426 Lower York Road
 New Hope, PA 18938
 (215) 862-5221
 GM.PA668@choicehotels.com

Lyra, Brian
 110 Conlyn Ave
 Franklin, MA 02038

Account: 441726944

Date: 2/6/16

Room: 320 SSC

Arrival Date: 2/4/16

Departure Date: 2/6/16

Check In Time: 2/4/16 3:35 AM

Check Out Time: 2/6/16 9:25 AM

Rewards Program ID:

You were checked out by: mevans

You were checked in by: jwhite

Total Balance Due: 0.00

Post Date	Description	Comments	Amount
2/4/16	Room Charge	#320 Lyra, Brian	80.10
2/4/16	City / County Tax		2.40
2/4/16	State Tax		4.81
2/5/16	Room Charge	#320 Lyra, Brian	89.10
2/5/16	City / County Tax		2.67
2/5/16	State Tax		5.35
2/6/16	Visa Payment		(184.43)

XXXXXXXXXXXX5773

Folio Summary 2/4/16 - 2/6/16

Room Charge	169.20
State Tax	10.16
City / County Tax	5.07
Visa Payment	(184.43)

Balance Due: 0.00

This rate is eligible for partner rewards. If this rate is changed, you may no longer be entitled to partner rewards.



You could be earning free nights and other great rewards. Join Choice Privileges today, at www.choiceprivileges.com.

Thank you for your stay. Visit ChoiceHotels.com/VerifiedReviews to post your comments about your recent experience (Click the 'Write a Review' button)

ENTERPRISE LEASING COMPANY OF PHILADELPHIA, 540 W STREET RD, WARMINSTER, PA 189743223 (215) 674-8400

RENTAL AGREEMENT
699044

REF#
3JCV95

SUMMARY OF CHARGES

RENTER
ALEXANDER, MICHAEL

ADDITIONAL DRIVER
GLOVSKY, CAROLYN

DATE & TIME OUT
02/06/2016 10:14 AM
DATE & TIME IN
02/13/2016 10:12 AM

BILLING CYCLE
24-HOUR

VEH #1 2015 DODG GEAR SXTR
VIN# 2C4RDGCG4FR652809
LIC# 3NV773
MILES DRIVEN 485

Charge Description	Date	Quantity	Per	Rate	Total
TIME & DISTANCE	02/06 - 02/13	1	WEEK	\$113.00	\$113.00
ADDITIONAL DRIVER FEE	02/06 - 02/13	7	DAY	\$20.00	\$140.00
REFUELING CHARGE	02/06 - 02/13				\$0.00
Subtotal:					\$253.00
Taxes & Surcharges					
PASSENGER CAR RENTAL TAX	02/06 - 02/13			2%	\$5.06
PENNSYLVANIA STATE SALES TAX	02/06 - 02/13			6%	\$15.18
PUBLIC TRANS ASSISTANCE TAX	02/06 - 02/13	7	DAY	\$2.00	\$14.00
Total Charges:					\$287.24
Total Amount Due					\$0.00

PAYMENT INFORMATION

AMOUNT PAID
\$287.24

TYPE
Mastercard

CREDIT CARD NUMBER
XXXXXXXXXXXX3940 PENDING

February 16, 2016 22:19

Page: 1

Receipt #: 5123767080

VISA #: XXXXXXXXXXXXX5773

2016/02/16 21:53

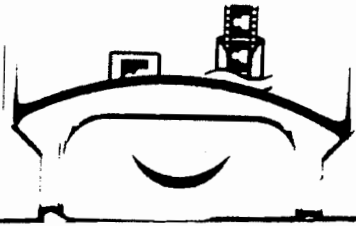
Qty	Description	Amount
20	PC Design Station Time/Minute	9.00
2	PC Design Station Time/Minute	0.90
SubTotal		9.90
Taxes		0.62
Total		10.52

The Cardholder agrees to pay the Issuer of the charge card in accordance with the agreement between the Issuer and the Cardholder.

FedEx Office Print & Ship Centers

**187 Dartmouth St.
Boston, MA 02116
617-262-6188
www.FedExOffice.com**

**Tell us how we're doing and receive
10% off your next \$10 print order
fedex.com/we listen or 1-800-398-0242
Offer Code: _____ Offer expires 03/30/2016**



PPA GATEWAY GARAGE
16TH & SPRING ST.

Pay Station Number: 10
Entered: 02/10/2016 11:38
Exited: 02/12/2016 14:04
Ticket Number: 5867
Transaction Number: 267267
Rate: A
Parking Fee: \$ 56.00

Total Fee: \$ 56.00
Fee Paid: \$ 56.00
Visa
Approval Number: 941653

Thank you for your visit
Please come again !

PPA GATEWAY GARAGE
16TH & SPRING ST.

Pay Station Number: 10
Entered: 02/08/2016 21:28
Exited: 02/09/2016 08:56
Ticket Number: 26743
Transaction Number: 284599
Rate: A
Parking Fee: \$ 5.00

Total Fee: \$ 5.00
Fee Paid: \$ 5.00
Visa
Approval Number: 045185

Thank you for your visit
Please come again !

PPA GATEWAY GARAGE
16TH & SPRING ST.

Pay Station Number: 10
Entered: 02/08/2016 00:11
Exited: 02/08/2016 21:26
Ticket Number: 28428
Transaction Number: 264467
Rate: A
Parking Fee: \$ 20.00

Total Fee: \$ 20.00
Fee Paid: \$ 20.00
Visa
Approval Number: 800869

Thank you for your visit
Please come again !

STAPLES

that was easy.

Low prices. Every item. Every day.
 Store No.:1542
 2280 Oregon Avenue
 Philadelphia, PA 19143
 (215) 465-1763

252929 XX 025 88064

Receipt #: 88064

VISA #: XXXXXXXXXX5773
02/10/16 08:30

Qty	Description	Amount
6	SS CR Minuties-828483	1.80
2	SS CR B&W LTR/LGL-828475	0.98
38	SS CR B&W LTR/LGL-828475	18.62

SubTotal 21.40
 STANDARD TAX 1.71
 Total 23.11

The Cardholder agrees to pay the issuer of the charge card in accordance with the agreement between the issuer and the Cardholder.

Compare and Save
 with Staples-brand products.
 THANK YOU FOR SHOPPING AT STAPLES!



15420210168898425

CVS/pharmacy

1424 CHESTNUT ST, PHILADELPHIA, PA
 PHARMACY: 963-9316 STORE: 963-9318

REDAUX 1RHS061 CSHR1331396 STR83/9

Helped by: DEJA

ExtraCare Card #: *****4692

1 BIC CRSTL PEN BLK 10CT 2.371
 1 BIC CRSTL PEN BLK 10CT 1.181 SMD 50x 1.19
 MAY 1, GET 1 FOR 60¢ OFF

2 ITEMS

SUBTOTAL 3.55
 PR 8 0% TRX .28
 TOTAL 3.83
 DEBIT 43.83
 *****5773 NS
 CHANGE 40.00



2500 3796 0398 0610 58

RETURNS WITH RECEIPT THRU 04/08/2016

FEBRUARY 8, 2016 3:53 PM

TRIP SUMMARY:

Today You Saved 1.19
 Savings Value 25x

THANK YOU. SHOP 24 HOURS AT CVS.COM

Visit www.cvs.com/shop and submit a
 review for your recent purchase to
 help others. Your opinion matters!



INVOICE

2

Rocky De La Fuente Campaign PA
Michael Alexander, Brian Lyra, Carolyn Glovsky

DATE: Feb 17, 2016

DATE: Feb 17, 2016

Balance Due: \$990⁵⁰

DATE: Feb 17, 2016

Benezet Consulting LLC

Item	Quantity	Rate	Amount
PPA Gateway Garage: entered 2/10 @ 11:39 exited 2/12 @ 14:04	1	\$56	\$56
PPA Gateway Garage entered 2/8 @ 21:05 exited 2/10 @ 16:47	1	\$25	\$25
PPA Gateway Garage: entered 2/8 @ 00:10 exited 2/8 @ 10:09	1	\$19	\$19
PPA Gateway Garage: entered 2/8 @ 21:28 exited 2/9 @ 8:56	1	\$5	\$5
PPA Gateway Garage: entered 2/8 @ 00:11 exited 2/8 @ 21:26	1	\$20	\$20
Street parking - 2/8 4:26pm - 7:26pm	1	\$7 ⁵⁰	\$7 ⁵⁰
Street parking - 2/8 2:27pm - 4:27pm	1	\$5	\$5
Street parking - 2/8 12:20pm - 12:20pm 2:20pm	1	\$5	\$5
Street parking - 2/9 2:23pm - 4:23pm	1	\$5	\$5
Street parking - 2/9 4:20pm - 6:20pm	1	\$5	\$5
Street parking - 2/9 6:32pm - 7:32pm	1	\$2 ⁵⁰	\$2 ⁵⁰
Street parking 2/11 10:01am - 11:13am	1	\$3	\$3
Street parking 2/11 5:32pm - 7:32pm	1	\$6	\$6
Street parking 2/11 7:50am - 10:00am	1	\$5	\$5
Street parking 2/12 7:54am- 10:00am	1	\$5	\$5
CVS: pens	1	\$3 ⁸³	\$3 ⁸³
Staples printing	1	\$23 ¹¹	\$23 ¹¹
Fedex store (scanning receipts)	1	\$10 ⁵²	\$10 ⁵²
Enterprise rent a car	1	\$287 ²⁴	\$287 ²⁴
Rodeway Inn & Suites (2/4 - 2/6)	1	\$184 ⁴³	\$184 ⁴³
Red Roof Inn 2/6 -2/7 (Brian)	1	\$78 ⁶⁴	\$78 ⁶⁴
Shell Doylestown 2/5 (Brian)	1	\$27 ²⁵	\$27 ²⁵
Shell Doylestown 2/5 (Kemitt)	1	\$10 ⁰⁸	\$10 ⁰⁸
Sunoco Feasterville (Brian)	1	\$6	\$6

Item	Quantity	Rate	Amount
Philly gas 2/6	1	\$5 ⁶⁶	\$5 ⁶⁶
Sunoco Trenton 2/7 (cheapest price I've seen in years, filled up both cars from empty)	1	\$45 ⁷⁹	\$45 ⁷⁹
APlus Walnut St Philla 2/12	1	\$3	\$3
APlus Woodhaven Road Philly 2/13 (caravan final fill before rental drop off)	1	\$30	\$30
APlus Woodhaven Road Philly 2/13 (subaru)	1	\$21 ⁰²	\$21 ⁰²
Sunoco Burlington 2/14	1	\$25 ⁰¹	\$25 ⁰¹
Raceway 2/15	1	\$19 ⁸⁵	\$19 ⁸⁵
NJ Turnpike	1	\$0 ⁹⁰	\$0 ⁹⁰
Port Authority NY Welcome to NY Bridge Tax 2/15	1	\$15	\$15
Mobil Lodge TPK I-395 2/16	1	\$19 ¹⁷	\$19 ¹⁷

Subtotal \$990⁵⁰

Total \$990⁵⁰

There was also \$15 in printing services we got at UPS store that I could not find the receipt for, as well as another \$15 trip to the dollar store to get boards, pens, clips, and other stationary supplies which I cannot find the receipt for.

*** DUPLICATE RECEIPT ***

SINOCCO A-PLUS

SINOCCO A-PLUS
300 E STREET ROAD
FT MERCERVILL, PA 19053
1142650566001

06/16 21:25:31

Product: 1 / Self

Product: Regular

Gallons 1.93

\$ / Gal \$ 1.879

Fuel Sale \$ 6.00

Total Sale \$ 6.00

XXXXXXXXXXXX

SUBCONTRACTOR AGREEMENT

THIS SUBCONTRACTOR AGREEMENT (this "**Agreement**") is made and entered into as of the ____ day of November, 2015, by and between Benezet Consulting, LLC ("**Benezet**"), a Texas limited liability company, and _____, an individual residing in _____ ("**Subcontractor**").

RECITALS

In consideration of the mutual covenants and obligations contained herein, the parties hereby agree

ARTICLE 1

1.1 Services and Duties. Subcontractor shall provide the services to Benezet as described in Attachment A (the "**Services**"). Subcontractor warrants that all Services under this Agreement shall be performed and completed in a professional, ethical, and competent manner.

1.2 Relationship of Parties. Subcontractor shall act as an independent contractor in performing the Services described in this Agreement. Nothing contained herein shall be deemed to make Subcontractor the agent, employee, joint venturer, or partner of Benezet, or be deemed to provide Subcontractor with the power or authority to act for or on behalf of Benezet.

1.3 Term. The term of this contract shall commence on November 9, 2015 (the "**Commencement Date**"), and shall continue until January 11, 2016.

1.4 Termination. Either party may terminate this Agreement at any time, and for any reason, by providing seven (7) days written notice to the other party. In the event of termination, all accrued compensation and reimbursement of all properly approved expenses incurred through the seventh (7th) day subsequent to receipt of such notice shall be paid. Benezet may terminate this Agreement for good cause immediately by written notice, and in that event Benezet will not be liable to Subcontractor for any work performed or any expenses incurred by Subcontractor after such notice has been sent.

ARTICLE 2 COMPENSATION

2.1 Compensation. For the performance of the Services and duties described in Article 1 and in Attachment A, in accordance with the terms of this Agreement, Benezet agrees to pay Subcontractor as set forth below.

2.2 Reimbursement on Signature Basis. Benezet agrees to reimburse Subcontractor on a per signature cost for signatures collected by Benezet Contractors pursuant to this section and the schedule in Attachment A. Subcontractor may hire, as independent contractors to Subcontractor, signature gatherers/circulators/field managers, subject to the terms and conditions of Attachment A.

2.3 Reimbursement of Expenses. Benezet shall reimburse Subcontractor for the business expenses up to \$1000 that are reasonable and necessary and are incurred by Subcontractor while performing the Services under this Agreement upon presentation of expense statements, receipts and/or vouchers, or such other information and documentation as Benezet may reasonably require

2.4 Billing and Payment. Subcontractor shall submit invoices to Benezet on an as-completed basis. If Subcontractor transmits an invoice to Benezet on a timely basis, then Benezet shall pay such invoice promptly upon receiving payment of such invoice from the Cruz campaign.

**ARTICLE 3
CONFIDENTIALITY**

3.1 Nondisclosure. Subcontractor agrees and acknowledges that, contemporaneously with the execution of this Agreement and throughout the course of his/her engagement with Benezet, Benezet may disclose to Subcontractor various "Confidential Information" which Subcontractor would not otherwise receive. Except as set forth herein, at all times during Subcontractor's engagement and thereafter, Subcontractor will hold in strictest confidence and will not disclose, use, provide access to, or publish any Confidential Information. Except as set forth herein, Subcontractor agrees that all Confidential Information, whether prepared by Subcontractor or otherwise coming into Subcontractor's possession, shall remain the exclusive property of Benezet. Subcontractor hereby assigns to Benezet any rights Subcontractor may have or acquire in such Confidential Information and recognizes that all Confidential Information is the sole property of Benezet and its assigns.

**ARTICLE 4
MISCELLANEOUS**

4.1 Notices. All notices and other communications required or permitted to be given hereunder shall be in writing to the parties at the following addresses or at such other addresses as shall be specified by the parties by like notice.

If to Subcontractor:

If to Benezet:

Trenton Pool
3800 Creek Road
Dripping Springs, TX 78620

4.2 Attorneys' Fees. In the event either party must bring suit for any reason under this Agreement, the prevailing party shall be entitled to recover all costs of such suit, including reasonable attorneys' fees, from the other party.

4.3 Choice of Law and Venue. Benezet and Subcontractor agree that the terms of this Agreement shall be deemed to be made under, governed by, and construed in accordance with, the laws of the State of Texas, without regard to any conflict of laws rule or principle which might refer the governance or construction of this Agreement to the laws of another jurisdiction. Any action in regard to this Agreement or arising out of its terms and conditions shall only be instituted in Hays County, Texas.

4.4 Severability and Reformation. If any of the terms or provisions contained in this Agreement are held to be invalid, void, or unenforceable by a court of competent jurisdiction, then the remaining terms and provisions shall continue in full force and effect, and the invalid, void or unenforceable provisions shall be deemed severable. Moreover, if any one or more of the provisions contained in this Agreement shall for any reason be held to be excessively broad as to duration, activity, or subject, it shall be reformed by limiting and reducing it to the minimum extent necessary, so as to be enforceable to the extent compatible with applicable law.

4.5 Counterparts. This Agreement may be executed in counterparts, and all counterparts will be considered as part of one agreement binding on all parties to this Agreement. This Agreement may be executed electronically, the signatures of which shall be deemed legal and binding as an original signature hereto.

4.6 Time is of the Essence. The parties acknowledge and agree that time is of the essence in performing their respective obligations under this Agreement.

4.7 No Assignment. Neither this Agreement nor any duties, obligations or rights under it may be assigned by Subcontractor without Benezet's prior written consent. Any attempted assignment or delegation of this Agreement by Subcontractor without the express written consent of Benezet will be void.


4.8 Entire Agreement of the Parties. This Agreement, including supersedes any and all agreements, either oral or written, between the parties hereto with respect to the performance Services by Subcontractor for Benezet and contains all the covenants and agreements between the parties with respect to the performance of such Services in any manner whatsoever.

4.9 Waiver. No waiver by Benezet of any breach of this Agreement shall be a waiver of any preceding or succeeding breach. No waiver by Benezet of any right under this Agreement shall be construed as a waiver of any other right.

IN WITNESS WHEREOF, Benezet and Subcontractor have executed this Agreement, effective as of the day and year first above written.

For Benezet Consulting LLC:

Dated: 12/8/2015

By: 

Print Name: Michael Alexander

Title: Contractor

Subcontractor

Dated: _____

By: _____

Print Name: _____

Attachment A

1. To gather signatures for the Ted Cruz for President 2016 Republican Primary Ballot in Vermont

- a. **Ballot Access/Signature Collection:** Subcontractor, in consultation with Benezet, will collect signatures. Subcontractor will keep Benezet apprised of signature collection efforts and expenses by 5 P.M. EST each day by reporting and/or, upon request, scanning proof of such.
- b. **Expenses:** Subcontractor will keep expenses under \$120/day up to a limit of \$1000 total expenses. Subcontractor understands that any expenses incurred by the subcontractors hired by Subcontractor will count toward this limit.
- c. Subcontractor understands that successful completion of the drive is paramount and promises to use best efforts to 60-75 signatures per day with a validity rate of at or above 80%. Subcontractor further promises to work in Vermont until the contract is completed, barring extenuating circumstances.

Vermont Rate Card

	Cost
Cruz Presidential	3.50/signature

Total signature requirements will be determined on a day to day basis between Benezet and Subcontractor.

XFINITY Connect

Page 1 of 2

XFINITY Connect

paul-rossi@comcast.net

+ Font Size -

Michael Alexander Fwd: Office Depot Store Receipt

From : Michael Alexander <greatwaldoneous@gmail.com>
Subject : Michael Alexander Fwd: Office Depot Store Receipt
To : Paul-Rossi <paul-rossi@comcast.net>

Mon, Sep 12, 2016 12:29 PM

1 attachment

Paul, I incurred these expenses scanning and emailing these documents.

----- Forwarded message -----

From: "Office Depot Store Receipt" <storereceipt@officedepot.com>
 Date: Sep 12, 2016 11:50 AM
 Subject: Office Depot Store Receipt
 To: <greatwaldoneous@gmail.com>
 Cc:

Office DEPOT OfficeMax

Questions? Call
 800.GO.DEPOT
 800-463-3768

OFFICE DEPOT STORE 06137
 617.445.5152
 8C Allstate Rd
 Dorchester, MA 02125

Date	09/12/2016	11:49 AM
Version	16.4.2	
Store	6137	
Register	5	
Transaction #	7210	
Employee	286968	
SALE		

Product ID	Description	Total
751095	SCANNING, DOC SCAN	
	5 @ 0.25	1.25
	You Pay	1.25S
	Subtotal:	1.25
	Sales Tax:	0.08
	Total:	1.33
	MasterCard 9186:	1.33
AUTH CODE	01282Z	
TDS	Chip Read	
AID	A0000000041010	4341504954414C204F4E45
TVR	0000008000	
CVS	No Signature Required	

Shop online at www.officedepot.com

WE WANT TO HEAR FROM YOU!

Participate in our online customer survey and receive a coupon for **\$10 off your next qualifying purchase of \$50 or more on office supplies, furniture and more.**

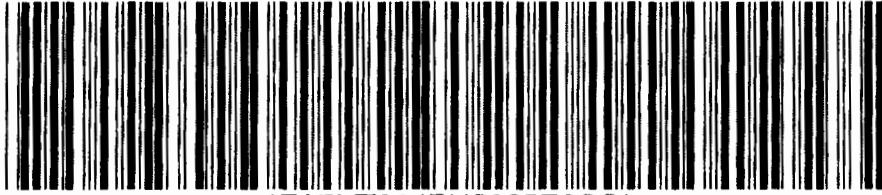
(Excludes Technology. Limit 1 coupon per household/business.)

Visit www.officedepot.com/feedback and enter the survey code below.

Survey Code: **V4KV 9GDM 3XTV**

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Page 2 of 2



E2PVT994PU5365E6CC

100 % Satisfaction Guarantee Click Here



20160912 1225
21.jpg

20160912_122521.jpg
4 MB

XFINITY Connect

Page 1 of 2

XFINITY Connect

paul-rossi@comcast.net

+ Font Size -

Michael Alexander Fwd: Office Depot Store Receipt

From : Michael Alexander <greatwaldoneous@gmail.com>
Subject : Michael Alexander Fwd: Office Depot Store Receipt
To : Paul-Rossi <paul-rossi@comcast.net>

Mon, Sep 12, 2016 12:29 PM

1 attachment

Paul, I incurred these expenses scanning and emailing these documents.

----- Forwarded message -----

From: "Office Depot Store Receipt" <storereceipt@officedepot.com>
 Date: Sep 12, 2016 11:50 AM
 Subject: Office Depot Store Receipt
 To: <greatwaldoneous@gmail.com>
 Cc:

Office DEPOT OfficeMax

Questions? Call
 800.GO.DEPOT
 800-463-3768

OFFICE DEPOT STORE 06137
 617.445.5152
 8C Allstate Rd
 Dorchester, MA 02125

Date 09/12/2016 11:49 AM
 Version 16.4.2
 Store 6137
 Register 5
 Transaction # 7210
 Employee 286968
 SALE

Product ID	Description	Total
751095	SCANNING, DOC SCAN	
	5 @ 0.25	1.25
	You Pay	1.255
	Subtotal:	1.25
	Sales Tax:	0.08
	Total:	1.33
	MasterCard 9186:	1.33
AUTH CODE	01282Z	
TDS	Chip Read	
AID	A0000000041010	4341504954414C204F4E45
TVR	0000008000	
CVS	No Signature Required	

Shop online at www.officedepot.com

WE WANT TO HEAR FROM YOU!

Participate in our online customer survey and receive a coupon for **\$10 off your next qualifying purchase of \$50 or more on office supplies, furniture and more.**

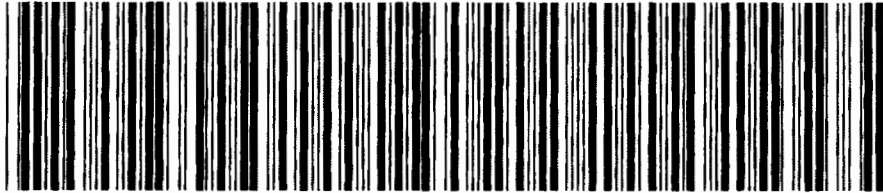
(Excludes Technology. Limit 1 coupon per household/business.)

Visit www.officedepot.com/feedback and enter the survey code below.

Survey Code: **V4KV 9GDM 3XTV**


XFINITY Connect

Page 2 of 2



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100 % Satisfaction Guarantee Click Here

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STAPLES

that was easy:

Low prices. Every item. Every day

Store No:426

990 Providence Highway

NORWOOD, MA 02062

(781) 255-7720

252525 XX 025 30729

Receipt #: 30729

MasterCard #: XXXXXXXXXXXXX9186

09/12/16 12:20

Qty	Description	Amount
2	SS CR Minutes-828483	0.60
	SubTotal	0.60
	STANDARD TAX	0.04
	Total	0.64

The Cardholder agrees to pay the Issuer of the charge card in accordance with the agreement between the Issuer and the Cardholder.

Compare and Save

with Staples-brand products.

THANK YOU FOR SHOPPING AT STAPLES!